LOUISIANA COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

PROGRAM EVALUATION AND MONITORING PLAN

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Overview

Section 104 of Title I of the Housing and Community Development Act of 1974, as amended, (Title 1) and 24 CFR Part 570.492 requires Louisiana to monitor its CDBG recipients. Program evaluation and monitoring is the mechanism by which the state's Office of Community Development (OCD) provides administrative oversight to Louisiana Community Development Block Grant (LCDBG) recipients. OCD's review process ensures that recipients are in compliance with three key areas:

- Approved activities have been carried out in a timely manner,
- Recipients' activities and certifications have been carried out in accordance with the requirements and the primary objectives of Title 1 and with other applicable laws, and
- Recipient has a continuing capacity to carry out approved activities in a timely manner.

During the course of an LCDBG project, OCD's Local Government Representatives (LGRs) will evaluate and monitor grant recipients both remotely and through periodic on-site visits. Under the LCDBG program, there are three major components of program evaluation and monitoring:

- Education: The provision of workshops, manuals, and handouts training recipients in program requirements and their basis. The primary educational efforts are the mandatory post-award workshops and the Grantee Handbook.
- Technical Assistance: Imparting information that will enable recipients to comply with the various state and federal requirements for their grants.
- Evaluation and Monitoring: A systematic process used to maintain contact with all recipients in order to track their progress, make comparisons between and among grantees, and identify grantees needing technical assistance.

In carrying out OCD's Title I responsibilities, one or more monitoring and/or technical assistance visits will be made during the project period for each grant.

Education

- Grantee Handbook: Revised and distributed annually to all grant recipients for that particular program year.
- Grantee Workshop: An official from each recipient's governing body is required to attend the
 Grantee Workshop held for that funding year's recipients, unless an official from the recipient's
 governing body had attended a Grantee Workshop within the last five years. In the course of
 this annual workshop all facets of the LCDBG Program are explained and discussed. In addition,

recipients are provided with copies of any revised or updated applicable state and/or federal regulations.

- Additional Training: Additional workshops are conducted and informational memorandums are distributed as training needs are identified. The OCD will designate recipients as high risk, medium risk, or low risk after considering the following factors:
 - Administrator
 - Complexity of activities involved in grant
 - Recipient previous performance

Those recipients designated as high risk will receive an on-site technical assistance visit from OCD staff prior to the recipient monitoring visit. Those recipients designated as medium risk will have the option of requesting an on-site technical assistance visit from OCD staff prior to the recipient monitoring visit. Those recipients designated as low risk will receive technical assistance on an as needed basis.

Policies and other information are available to grant recipients on the OCD website.

Technical Assistance

This may be done on-site or remotely. The grant's LGR can use technical assistance to achieve early resolution of problems encountered with a project. Technical assistance examples include:

- Explanation of project start-up requirements and assistance with establishment of program files.
 A project's filing system must provide a historic account of the recipient's activities, be easy to use and centrally located. (NOTE: Private consultants administering a grant for a local government should <u>not</u> keep original project files original project files must be maintained at the recipient's location. Consultants may keep a duplicate set of project files.)
- Advice on technical requirements such as preparation of the Environmental Review Record, property acquisition, job creation, labor standards, procurement, civil rights compliance, etc.
- Visits to high and medium risk recipients to review compliance requirements on-site.

Evaluation and Monitoring

LGRs have the responsibility to ensure that recipients carry out their programs in accordance with all applicable laws and regulations. It is mandatory that Local Government Representatives (LGRs) be familiar with the program requirements. The Grantee Handbook and regulation updates are the primary tools for gaining knowledge of the federal and state regulations. State staff with

specialist assignments can provide additional support in their areas. The objectives of the LCDBG staff in evaluating and monitoring grant projects are to determine if recipients are:

- Carrying out their LCDBG programs as approved in their application
- Complying with applicable federal and state regulations
- Carrying out their programs in accordance with the most current program (time) schedule
- Demonstrating a continuing capacity to carry out the approved programs
- Requesting reimbursement only for approved project costs

Ongoing Remote Evaluation

Ongoing remote evaluation is the primary method of tracking grantee performance/compliance on a daily basis, determining the need for technical assistance, obtaining data to plan for the routine site visits, and determining the need for exception site visits. To the extent possible, this evaluation utilizes existing data that is routinely submitted for other purposes. Much of the data is captured on the office's in-house electronic grants management tracking system, Granting and Underwriting Monies to Benefit Others (GUMBO). The following are examples of data submitted which are utilized:

- Recipient's application
- Performance schedule •
- Recipient's contract
- Request for payment (RFP)
- Request for release of funds
- Ten day call and request for a wage rate decision

- Verification of contractor eligibility
- Notice of contract award
- Final wage compliance report
- Citizen complaints
- **Audits**

The first ongoing evaluation activity is to examine the recipient's performance schedule, approved application, and contract. All activities included on the schedule should be consistent with the approved application (and any pertinent program amendments). The time period indicated should be reasonable and consistent with the project's LCDBG contract period. It shows, by quarter, expected milestones and expenditures by activity. The performance schedule and any subsequent revisions or amendments must be placed in the grantee's financial management and drawdown files in order to be compared with actual drawdown notes. Any discrepancies must be resolved with the recipient. Contract conditions established in the recipient's contract are also tracked for timely completion.

Each Request for Payment (RFP) submitted by the recipient indicates the budget line item for which the draw is being made. The RFP is entered into GUMBO and the invoice tracker and approved for payment. The invoice tracker identifies details of the financial data that is entered into GUMBO. It is printed and filed in the Request for Payment file.

The RFPs, invoice tracker, and program time schedule provide the most current information on the performance of the recipient's program. The RFP file can be used as a tool to:

- Compare cumulative drawdowns with funds budgeted to make sure the amount drawn does not exceed the budgeted amount without appropriate changes.
- Determine if activity drawdown rates reflect the performance schedule submitted by the recipient. Discrepancies between the schedule and the amount drawn are discussed with the recipient.
- Activities on the schedule for which no funds have been drawn after the proposed scheduled initiation date are discussed with the recipient.
- Determine if a revised performance schedule is needed as the result of a project delay, program amendment, or contract extension.

When appropriate, a revised performance schedule is requested as well as an explanation for the reason the program activities are behind schedule. The recipient must submit a detailed timeline indicating the realistic proposed time of completion of the activities. The timeline duration should not exceed the time frame of the current contract.

Other sources for charting the recipient's performance include:

- Change in activities due to program amendments and budget revisions
- Changes in funds budgeted due to program amendments and budget revisions
- Changes in completion dates due to revised schedules and contract extensions

A Budget Reconciliation Report is required when there is a change in the category of expenditure as requested in a previous RFP. In this report, actual expenditures are compared with budgeted amounts and amounts requested (24 CFR 85.2(b)(4)). If amounts on the Certificate of Completion (closeout) differ from the LCDBG records, budget reconciliation will be mandatory prior to closeout.

Any complaints made to OCD about a recipient's program are sources of valuable compliance information. A record of the complaints received, identifying the actions taken and the results of the actions is maintained in the permanent grant file. The validity of all complaints suggesting problems in performance or compliance should be included in the assessment of the recipient's need for regular or exception monitoring.

To assist LGRs in managing the on-going evaluation of recipients, monthly tickler and exception reports are produced by GUMBO. Tickler reports remind the LGR of certain steps to be taken as a project progresses. Such reminders include, but are not limited to: monitoring due, close-out due, audit due, et cetera.

LCDBG | Program Evaluation & Monitoring Plan

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The exception report is provided to the Director of the Office of Community Development and lists those items previously reported to the LGR on the tickler report that were not accomplished. It is each LGR's responsibility to inform the Director and to document the file as to why the actions were not accomplished.

On Site Monitoring

LCDBG staff monitors the following areas which include but are not limited to:

- Program progress
- General organization of files
- Financial and general contract management
- Labor standards
- Civil Rights
- Environmental review
- Real property acquisition
- Demolition/clearance activities

- **Public facilities**
- Procurement
- Housing rehabilitation/replacement
- Economic development
- Local complaint procedures
- Program benefit compliance with national objectives
- Citizen participation.

There are two types of on-site compliance assistance visits: exception and regularly scheduled monitoring.

EXCEPTION VISITS:

When there is a serious problem in performance or other issues, an exception visit may be required. The Community Development Director/Supervisor should be notified of the potential problems. If there is concurrence, the LGR or an LGR program area specialist (depending on the nature of the anticipated problem) will be instructed to initiate a site visit.

REGULARLY SCHEDULED MONITORING VISITS:

Each recipient will be monitored on site at least once during grant implementation. When the overall expenditures on a program reach or exceed fifty percent, the recipient will be scheduled for and notified of the upcoming monitoring visit.

SCHEDULING THE SITE VISIT:

The LGR assigned to the grant will contact the grant consultant and/or recipient to schedule the visit. A letter confirming the date is then sent to the recipient indicating that all program files will be reviewed and a visit to the project site will be made during the monitoring visit.

STEPS IN THE SITE VISIT PROCESS:

Preparation for Site Visit

OCD utilizes monitoring checklists in the performance of site visits to ensure compliance with all applicable laws and requirements. The LGR should complete the Monitoring Preparation Checklist prior to the visit.

This pre-populates certain information on the checklists, saving time during the visit.

Entrance Conference

The monitoring visit begins with an entrance conference with the grant administrator, a representative of the recipient, and others the recipient deems should attend. The LGR will explain the purpose of the monitoring visit and the areas to be monitored. The monitoring visit will be conducted in accordance with

OCD's monitoring procedures.

Review Recipient Files Using Monitoring Checklists

The monitoring checklists are the primary tool used to monitor recipient performance in the LCDBG program. The monitoring checklists are revised whenever necessary to reflect changes made in program

guidelines and regulations.

All pertinent monitoring checklists must be completed with findings and areas of concern noted during the site visit. This will require the participation of the local government, the administrative consultant, and possibly the project engineer. If problems are identified during the review, an attempt should be made to correct them on-site. When the problem cannot be remedied completely on-site, the steps

necessary to correct the problem should be explained to the recipient.

A comprehensive review of program performance must be made using the appropriate checklists. A checklist has been prepared for each program area as well as each compliance area. The specific items to be reviewed will depend on the stage of progress when visited, the type of project, and whether or not it is the first or a subsequent visit. Each program and/or compliance area has a unique monitoring code. The following provides the monitoring code for each program and/or compliance area and a brief description

of its checklist:

01 **Financial Management**

> The review of the recipient's financial management system checks its compliance with 24 CFR 85.20 and Uniform Grant Guidance 2 CFR Part 200. These circulars can be used as reference items during monitoring. The financial management checklist is completed by an OCD staff member.

The checklist assists in determining if the following criteria have been met:

the grantee's financial management system provides for current, accurate and complete

disclosure of financial results

- there is adequate and clear identification of the sources and uses of funds
- there is effective property management and control
- the grantee's records allow for comparison of actual and budgeted amounts by activity
- there are procedures for minimizing the time elapsing between the receipt and expenditure of grant funds
- there are procedures in place for determining if the costs are reasonable, allowable and correctly allocated in accordance with state and federal regulations

02 <u>Environmental Review</u>

Since each grant recipient receives environmental clearance prior to contract release, the task of the on-site monitor is to ensure that the approved Environmental Review Record (ERR) is still relevant. The as-built plans and specifications, the description and map in the application (or program amendment, if applicable), and the map included in the approved ERR are compared to the physical site to ensure that no project sites have changed. If a project site has changed, the ERR would require an amendment.

If the project involves housing rehabilitation or emergency spot repairs, it is confirmed that all homes rehabilitated are located within the target area. If the location of a house falls outside the cleared target area, the ERR must be amended.

The letters in the ERR from other agencies are reviewed for any additional requirements, such as permits, inadvertent discovery clause requirements, etc. Particular attention is given to the letter from the State Historic Preservation Office in case they require photographs of certain houses before rehabilitation.

03 Labor Standards

The objective is to ensure that the required procedures were implemented in accordance with the statutory/regulatory provisions (Davis-Bacon Act, Contract Work Hours and Safety Standards Act, Copeland Anti-Kickback Act and other requirements). When monitoring, the bid and contract documents are reviewed for the inclusion of the federal labor standards provisions and the correct federal wage determination. Other documentation should include notices of contract award and preconstruction conference (if applicable) and preconstruction conference minutes if a pre-construction conference was conducted, evidence that the federal wage decision, any additional classifications, and the Davis-Bacon poster have been posted at the construction site, and that proper contractor clearances were obtained timely.

Weekly payrolls are reviewed carefully. Each contractor and subcontractor must submit weekly payrolls from the time work is started until it is completed for each week in which work occurred.

Each payroll submitted must be accompanied by a Statement of Compliance signed by an officer or designee of the company.

In examining the payrolls, it is verified that only classifications appearing on the wage determination are used and that a disproportionate employment of laborers to mechanics does not exist. Wage rates reported on the payroll must be at least equal to the wage decision. If a lesser rate was paid, the grantee's files should include records of restitution made. Payroll computations are spot-checked; deductions made are reviewed for any non-permissible deduction. The information on the employee interview form is checked against the wage determination and applicable payroll sheet. Also reviewed is that overtime pay for work in excess of 40 hours in one week was paid correctly.

04 Civil Rights

Review of Civil Rights is primarily concerned with the locality's actions undertaken on its own behalf. There are five specific areas to be reviewed:

- actions taken to further fair housing,
- the local government's equal employment opportunity practices,
- Section 3 requirements,
- Section 504 Compliance, and
- Minority Business Enterprise (MBE) participation.

In the area of fair housing, the local government agreed by signing the assurances in the application and the grant contract to implement measures to affirmatively further fair housing in their community. Whether or not they have implemented a program which addresses this issue is reviewed.

In reviewing equal opportunity personnel practices, it is determined if the locality gives fair and equitable treatment with respect to hiring, salary and promotional opportunities to all job applicants and employees.

It is verified that the locality has adopted a written Section 3 plan containing certain criteria and that they are abiding by their plan.

Compliance with the accessibility requirements of Section 504 is also reviewed.

It is also confirmed that the grantee encouraged and/or achieved MBE participation.

05 Acquisition

The review of real property acquisition covers compliance with the Uniform Relocation Assistance and Real Property Acquisitions Policy Act of 1970 (Uniform Act). The Uniform Act is very specific about which acquisitions are subject to its requirements and the procedures which must be followed to acquire property. Therefore, there are two separate components of review:

- It is determined if exempt or non-exempt acquisition occurred for the project's implementation. Any non-exempt acquisition initiated after submission of the application must comply with the Uniform Act regardless of the source of funds. Additionally, property obtained prior to application submission on which LCDBG activities will take place may be subject to the Uniform Act.
- Specific acquisitions under the project are reviewed, if any, to ensure that proper Uniform Act procedures were followed during the acquisition of each parcel of property.

06 Residential Relocation/Displacement Checklist

The review of relocation covers compliance with the relocation provisions of the Uniform Act. For those relocations not subject to the Uniform Act, the locally adopted displacement policy is reviewed and a determination is made as to whether or not the grantee followed their policy in completing their non-Uniform Act relocation activities. For those grantees with relocation covered by the Uniform Act, the Part 2 checklist for each displacement is completed.

07 **Housing Rehabilitation**

When LCDBG funds are used for housing rehabilitation or reconstruction, the units must be brought up to the Section 8 Housing Quality Standards and Cost Effective Energy Conservation Standards. Part I of the housing rehabilitation checklist covers the overall program. Part II covers the inspections of a representative sample of individual properties. The number and types of individual property files selected constitute a representative sample of the entire rehabilitation and reconstruction case inventory, generally 10 percent but at least one of each type of unit if there are both rehabilitated and reconstructed homes in the project. In addition, any property on which the local jurisdiction has received a complaint is reviewed. On-site property inspection is conducted to determine if funds were expended for the completion of identified planned work. If funds expended are not clearly reflected in the work accomplished, the LGR further investigates to determine the possible cause of the discrepancy.

All construction contracts must include the language and requirements specified in applicable federal, state and local laws governing the program. Unless construction is undertaken in a structure with eight or more units, the Davis-Bacon and other labor standards provisions do not apply.

80 **Procurement Procedures**

The procurement procedures checklist is used to verify that the solicitation and subsequent award of contracts was in accordance with the procedures established by the federal Uniform Grant Guidance, state bid laws, and LCDBG program directives. Administrative consulting, engineering, and/or construction contracts procured with CDBG funds are reviewed. A sample of other professional services contracts (appraisers, review appraisers, auditing firms, legal services, etc.) is also reviewed. All sole source contracts are reviewed.

In general, documentation is reviewed to ensure that: (1) recipients have documentation to justify the method of procurement used to select the provider; (2) cost analysis was performed to determine the reasonableness of the contract price; (3) contracts contain clear description of the provider's duties and responsibilities and; (4) payments are adequately justified and documented.

09 Program Performance - Administration

The Request for Payment file, the invoice tracker, and the performance schedule are used to compare planned vs. actual progress. Reasons for delays should be noted and the need for a revised schedule discussed with the recipient.

In discussing major problems which may affect the feasibility of or delay the entire program, the problems and possible results are noted on the performance checklist. Examples of such problems include litigation, inability of developer to obtain financing, loss of local funding commitments, etc. Early notification of major problems permits the State to provide technical assistance and assist with contingency plans.

10 Compliance with National Objectives

The purpose of this review is to ascertain that the grantee has documentation on file which supports that one of the national objectives is being addressed by the program.

12 Record Keeping

The record keeping requirements included in the Grantee Handbook are specific. The grantee's overall filing system is reviewed for adequacy.

13 Citizen Participation

Citizen Participation files are reviewed to determine that the local community has made every effort to involve the community's citizens during the application process and in the on-going grant activities. The specific requirements are presented in the application packages, on OCD's website, in grantee handbooks, and in the State's Citizen Participation Plan.

14 Other:

(a) <u>Anti-Displacement</u>

As part of this review, the Residential Anti-Displacement and Relocation Plan, adopting resolution and certification are reviewed. If a person or business has been displaced as a result of the LCDBG Program, Part 2 of the checklist is completed.

(b) <u>Clearance/Demolition</u>

The review of clearance/demolition covers the locally adopted clearance/demolition policy and its compliance with the LCDBG regulations and state laws, and determines if the activities conformed to those outlined in the approved application.

(c) <u>Economic Development</u>

The review of the economic development portion of the grantee's files is to ensure that the contractual provisions contained in their contract with the State have been accomplished.

The checklist is used to assist in determining if the following criteria have been met:

- the number and percent of low/moderate income jobs have been or are being achieved
- the developer has submitted the required financial reports
- the projected sources and uses of funds have been realized
- the LCDBG loan (if applicable) has been properly secured and repayments are being made according to schedule
- program income (if any) is being accounted for and returned to OCD

Employment is verified by reviewing the most recent payroll records rather than a compilation of job applications to ensure that job replacements are not being counted in the employment total.

Visit the Construction Site

The actual construction site must be visited to ascertain that it corresponds to the site approved by the Office of Community Development in the application, plans and specifications, environmental review record, and program amendments (if any). It also enables the LCDBG staff to complete certain questions on the checklists.

Exit Conference

At the conclusion of the monitoring visit, an exit conference is held with the recipient's representative, anyone else the recipient deems appropriate, and the grant administrator. The purpose of the conference is to summarize the results of the visit based on the Exit Conference report completed during the monitoring review. The exit conference may notify the recipient that no problems were found during monitoring review and the project is in compliance with applicable requirements. Should there be problems, the recipient is encouraged to participate through the provision of explanations and additional data which may resolve and correct any issues. Identified problems with fiscal implications are particularly stressed. Problems/issues are presented and discussed in the following context:

- A "Finding" is an action or lack of action(s) in direct violation of a statutory requirement, regulation, or policy. Findings are rated as one of the following:
 - Minor
 - Serious
 - Very Serious

Findings normally require the recipient take corrective action as outlined in the monitoring letter from the State.

 An "Area of Concern" is a non-statutory issue that involves program management. Recommendations may be provided to address the identified concern. The recipient is not required to take any corrective action, but it is encouraged to give consideration to the state's recommendation.

Monitoring Follow-Up Procedures

A monitoring letter is sent to the recipient, reporting the results of the monitoring visit. The monitoring letter to the recipient includes the following information:

- Contract number
- Date of the visit
- Scope of the monitoring visit
- Monitoring findings (merits and/or deficiencies and concerns) supported by the facts considered in reaching the conclusions
- Specific corrective actions/recommendations if necessary (i.e., means by which a finding of deficiency can be resolved)
- Due date of any necessary corrective action (generally 30-45 days, depending upon the nature of the findings)
- If appropriate, the offer of technical assistance

Monitoring letters are mailed within 30 days after the visit. All findings of deficiency included in the letter will be entered into GUMBO for tracking purposes.

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Last Modified: 12/12/2019

When issuing findings of deficiency, the following codes are used.

1. CONTRACT NUMBER

2. SOURCE OF FINDING (1 Digit)

- 0 = Ongoing Monitoring
- 1 = On site
- 2 = Complaints
- 3 = HUD Oversight
- 4 = Audit
- 5 = Other
- 6 = In-House

3. <u>SERIOUSNESS OF FINDING</u> (1 Digit)

- 0 = Minor
- 1 = Serious
- 2 = Very Serious

4. PROGRAM AREA (2 Digits)

- 01 = Financial Management
- 02 = Environmental Review
- 03 = Labor Standards
- 04 = Civil Rights
- 05 = Acquisition
- 06 = Relocation
- 07 = Housing Rehabilitation
- 08 = Procurement
- 09 = Program Performance-Administration

10 = National Objectives

12 = Record Keeping

13 = Citizen Participation

14 = Other (including but not limited to: Anti-displacement, Clearance/Demolition, and Economic Development

5. FINDING NUMBER

Contract # – Source of Finding – Seriousness of Finding – Program Area and Finding Number*

101-3007 – 1 – 2 – 091

Upon receipt of the monitoring response from the recipient, the LGR decides whether or not the information is sufficient to resolve/clear the finding. A status letter to the recipient addressing the recipient's response to each finding of deficiency is prepared. Findings which are not properly addressed or resolved remain open and a new target date for clearance is given to the recipient in this letter. Each LGR continues to provide technical assistance to the recipient until all finding(s) of deficiency are resolved. As each finding is cleared, the clearance date is entered into GUMBO and a new status letter is sent to the recipient.

In the event that a recipient is unwilling or unable to clear the finding(s), the State may impose one or more sanctions outlined in the section herein entitled Sanctions and further addressed in the State's Policy on Corrective and Remedial Actions.

Sanctions

Sanctions become necessary when every effort has been made to clear findings of deficiency within the prescribed time period and findings remain unresolved. The State's Policy on Corrective and Remedial Actions includes the following sanctions:

- Termination of the grant
- Reduction of the grant amount
- Debarment from future program participation
- Imposition of additional contract conditions
- Recapture of funds

^{*}In numbering findings, the program area is expanded to three digits to include the sequential number of the finding. For example, the first finding under program performance-administration would be 091, then 092.

• Litigation/suit

The internal procedures for issuing/clearing sanctions are implemented in accordance with the policy then in effect.

Closeout and Audit Review

Closeout

All findings of deficiency (audit and/or monitoring) must be resolved prior to closeout of a grant. The LGR requests closeout documents when a recipient has requested ninety percent of the LCDBG funds. When closeout documents are received, they are reviewed by the LGR for completeness and accuracy. In addition, prior to preparing the closeout letter, the following must occur:

- The Certificate of Completion form must be approved by the OCD Policy and Programs Coordinator.
- A copy of the Final Wage Compliance Report must be cleared by the Labor Compliance Officer.
- Three Certificates of Completion (all with original signatures) must have accompanied the recipient's closeout documents.

Generally, a conditional close-out is issued if all LCDBG expenditures have not been covered in financial reports. A recipient cannot receive a final closeout until financial reports covering all expended funds have been received and approved. Once executed, the closeout letter and Certificates of Completion are distributed as follows: one to the recipient, one to the Office of Finance and Support Services, and one to the permanent file.

Audit Review

Each recipient is required to provide OCD with a financial report for each fiscal year during which the grant is open. A letter requesting the financial report is sent to each recipient thirty days prior to the financial report due date. If a financial report becomes delinquent, a series of audit past-due letters are sent requesting the financial report. If the grant is not closed-out, a finding of deficiency will result after the audit is 60 days past due. If the grant is closed out, a sanction is issued after the audit is 120 days past due. In addition, state law requires that a grantee cannot receive funds from a state agency if the audit is 15 days past due. A letter is sent to the grantee which indicates that they are on the State Legislative Auditor's delinquent list and that they cannot receive further grant funds until the audit is submitted.

When an audit is received, the financial report reviewer reviews the information in the audit to determine financial report compliance and agreement with LCDBG program records.

Letters for unacceptable financial reports, questioned costs, et cetera are developed individually for each specific situation. Any resulting audit findings are tracked following the same procedures as previously outlined for monitoring findings. Any corrections requested must be resolved prior to final close-out.

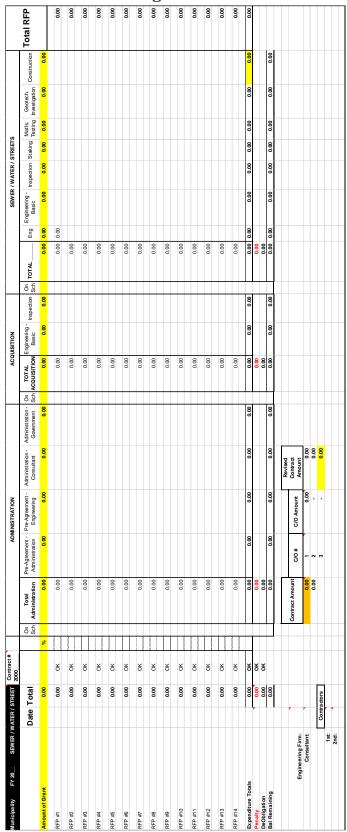
If a recipient has received program income prior to final closeout, then these funds must be returned to OCD. Any program income received after final close-out must follow the rules set forth in the State's Consolidated Annual Action Plan for the grant's corresponding program funding year.

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EXHIBITS

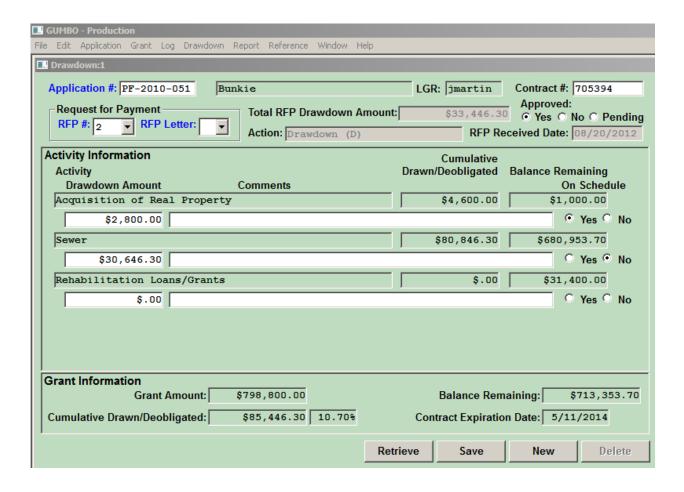
1: Invoice Tracking Worksheet



LCDBG | Program Evaluation & Monitoring Plan

Last Modified: 12/12/2019

2: Request for Payment Entry in GUMBO



3: Program Performance Schedule

	200	CODO TENTONINANO DE SONO DE LA COLOR DE LA				25	ATTICANI NAME									
ACTIVITIES	Quarter 1 July- Sept	Quarter 2 Oct Dec	Quarter 3 Jan Mar	Quarter 4 Apr June	Quarter 5 July- Sept.	Quarter 6 Oct	Quarter 7 Jan- Mar	Quarter Apr	Quarter 9 July- Sept.	Quarter 10 Oct	Quarter 11 Jan Mar	Quarter 12 Apr June	Quarter 13 July- Sept.	Quarter 14 Oct	Quarter 15 Jan- Nar	Quarter 16 Apr June
Activity #1 Milestones						1										
Activity #2 Milestones																
Activity #3			53		83		- 55	88						83		
			65				Ĭ.	85		8				2		8
Activity #4 Milestones																
							_									

4: Tickler Report

due

int			Action Due	ED status report due Final closeout is past due Final closeout is past due Bid Advertisement Published date is c Closeout request due Closeout request due Monitoring visit due
State of Louisiana Office of Community Development	Tickler Report	al	t Date Due PCT Drawn ir	5/31/2011 9/7/2012 11/15/2012 12/5/2012 99 %
St _a Office of C	•	Financial	Report Number	
			Recipient Nam e	Tangipahoa Parish Ferriday Delta New Llano Tangipahoa Parish Winn Parish Bossier Parish
	LGR: Buckli Stanga	I	Contract Application Number Number	ED-2008-004 DN-2010-001 PF-2008-189 PF-2012-052 ED-2008-004 ED-2006-008 PF-2010-050
	LGR: Bu		Contract Number	684996 698535 671604 714983 684996 648468

5: Exception Report

State of Louisiana Office of Community Development

Exception Report

Date Due PCT Drawn Action Due	.1 ED status report past due	.2 Contract has expired	-	100% Monitoring visit due
Date Du	6/30/2011	8/10/2012	10/7/2012	
Financial Report Number				
Recipient Name	Tangipahoa Parish	Tangipahoa Parish	Ferriday	Bossier Parish
Contract Application Number Number	ED-2008-004	ED-2008-004	DN-2010-001	PF-2010-050
Contract Number	684996	684996	698535	708694

LCDBG | Program Evaluation & Monitoring Plan

LGR: Buckli Stanga

6: Monitoring Visit Letter

Date

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 99999

RE: Monitoring Visit

FY 20xx LCDBG Public Facilities Program

Contract Number 777777

Dear Mayor Smith:

This letter is to confirm that John Doe, Jane Public, and Fred Jones will conduct a comprehensive review of your FY 20xx Louisiana Community Development Block Grant (LCDBG) Program on March 13, 20xx. They should arrive at the Village Hall between 1:30 p.m. and 2:30 p.m. They will want to talk to the people carrying out the program as well as review program files and visit the project site(s). Please have all files available for their review, as OCD staff will monitor the grantee's files, not the files belonging to the grant consultant.

Please ensure that current proof of bonding or insurance covering those who handle LCDBG financial transactions is available for review.

It is required that you or your representative attend the exit conference that will be held at the conclusion of the staff review. If you have any questions, please contact Fred Jones at (225) 342-7412.

Sincerely,

Traci M. Watts
Director, Louisiana Community
Development Block Grant Program

c: Ms. Debbie Howe, Grant Consultant

Uptown & Associates, Engineering Firm

Mr. John Doe, Office of Community Development

Ms. Jane Public, Office of Community Development

Mr. Fred Jones, Local Government Representative

File: Public Facilities, FY 20xx, Monitoring

7: LCDBG Evaluation and Monitoring Checklists

STANDARD CHECKLISTS

FOR USE ON

ALL PROJECT MONITORINGS

General Information	eparation Checklist (pages 1-4)	Updated: April 2017
General Information	Grantee:	
	Contract Number:	
	Grant Program Year:	
	Grant Type [PF, HO, ED, DN, LS]:	
Contacts	Entity [Village, City, Town, Parish]:	
Contacts	Chief Elected Official:	
	Consultant:	
	Engineer:	
	LGR:	
Dates	5.4.4.4	
and a	Date of Application:	
	Authorization to Incur Costs:	
	Transmittal of Contract:	
	Consultant Cleared:	
	Engineer Cleared:	
	Consultant Contract:	
	Engineer Contract:	
	CDBG Contract Ends:	
	Monitoring Visit:	
mounts/Activities/Nat'l Objective	Grant Award Amount	
\$20	Percent Drawn to Date:	
	Local Funds:	
	Other Funds:	
	Activity:	
	National Objective:	
	ORIGINAL Budgeted Amount for Activity:	
	Most recent REVISED Budgeted Amount for Activity:	
	Expenditures to Date:	
	Activity:	
	National Objective:	
	ORIGINAL Budgeted Amount for Activity:	
	Most recent REVISED Budgeted Amount for Activity:	
	Expenditures to Date:	
	Activity:	
	National Objective:	
	ORIGINAL Budgeted Amount for Activity:	
	Most recent REVISED Budgeted Amount for Activity:	
	Expenditures to Date:	
	Activity:	
	National Objective:	
	ORIGINAL Budgeted Amount for Activity:	
	Most recent REVISED Budgeted Amount for Activity:	
	Expenditures to Date:	
	Grant Award (OR/GINAL BUDGET):	
	Grant Award (REVISED BUDGET):	\$0.00
	Total Expenditures to Date:	

Acqu	isition	Yes	No	N/A
1,	Did application include acquisition by purchase or donation?			- 1001
Anti-	Displacement	Yes	No	N/A
2.	Does plan identify a person who is responsible for displacement and	763		14/24
	relocation compliance?			
	~ If Yes , note name of contact person:			
3.	Was a person or business displaced as a result of this program?			
	- If Yes, print Part 2 of the Checklist.			
Management and the last	n Participation		Yes	No
5.	Did grantee's public notice for the public hearing state the following would be discussed?			
	 amount of funds available for community development and housing needs, 			
	 range of eligible activities and estimated amounts for activities that will benefit 			
	low to moderate income persons,			
	 applicant's plans for minimizing displacement and the provision of benefits should displacement occur, and 			
	information of the applicant's past CDBG performance.			
6	Did the notice encourage citizens, particularly those of low/mod income and			_
	residents of slum/blight areas to submit their views on community development			
	and housing needs?			
7.	Did the notice state that accommodations would be provided for non-English		-	
	speaking and disabled individuals?			
8.	Were five calendar days allowed for notification of the public hearing?			_
11.	Was the second public notice published:		_	
	 after the first public hearing was held 			
	 after all forms in the application were dated 		7	
	 prior to application submittal? 			
12.	Company of the state of the sta			
	application submittal?		5 33	
13.	Was the following information included in the grantee's second public notice?			
	proposed objectives proposed activities		-	
	location of proposed activities			
	activity amounts			
	application submittal date			
	the opportunity to comment on the application & place and time to review			
Civil F	tights		****	115-4170
17-22	Is grantee's grant award more than \$200,000?	Yes	No	N/A
25-27	The grant of the control of the cont			
Enviro	onmental	Yes	No	N/A
1.	Were all activities exempt from the environmental review process?			
2.	Did any tribe request to be a consulting party?			
	~ If Yes , what were the conditions of their request?			
	~ Were the conditions of their request met?			
4	Did the Historic Preservation Officer request additional information			
7	before or during construction?			
Financ		Yes	No	N/A
5.	Are there any delinquent financial reports?	100		14074
6.	Does grantee have more than one open CDBG grant?			
9.	Date 1st administration invoice: Period covered:	81	_	
	Date 1st construction invoice: Period covered:	9		
10.	Were there internal control findings relevant to the program in the recent audit?			

1.	Did grantee have prior app	proval from OCD to use Ford	e Account?	Yes No	N/A
		Prime Contractor 1	Prime Contractor 2	Prime Contractor 3	
	Contractor				
	Bid Opening Date				
	Date of Eligibility				-
	Date of Contract Award			8	
	Lock-In Date				
	Total Contract Award				
	Work Description			0	_
	A. Decision Type				
	Effective Decision #				
	Effective Mod #				
	Effective Issue Date				
	B. Decision Type				_
	Effective Decision #				_
	Effective Mod #				
	Issue Date				
	100000000000000000000000000000000000000			P.C. 1 P.C. 2	P.C.
33	(Answer: Yes, No or N/A)	act awarded more than 90 d	ays after the bid opening?	× = = 0 = = =	
_	irement	hald a second			
4.		all or part of a professional s	vervice contract(s)?	Yes No	·_
4.	Were grant funds used for				·_
_	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	red for; \$	Engineering Fees O		·_
4.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow	red for; \$	Engineering Fees OC	CD allowed for:	 `_ _
4.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	red for; \$	Engineering Fees OC	CD allowed for:	,_
4.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	red for; \$	Engineering Fees Of pre basic	CD allowed for, -agreement: \$ engineering: \$,_
4.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	red for; \$	Engineering Fees Of pre basic	CD allowed for: -agreement: \$ engineering: \$ inspection: \$	·_ =
4.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	red for; \$	Engineering Fees Of pre basic	CD allowed for: -agreement: \$ engineering: \$ inspection: \$ topo survey: \$,_ = =
4.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	red for; \$	Engineering Fees OC pre basic	CD allowed for: -agreement: \$ -engineering: \$ -inspection: \$ -topo survey: \$ -perty survey: \$,_ ;_ = =
4.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	red for; \$	Engineering Fees OC pre basic	CD allowed for: -agreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$,_ = = = =
5.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement:	sed for; \$ \$	Engineering Fees OC pre basic proj	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$	`_ = = = =
5.	Were grant funds used for a (If Yes , continue.) Consulting Fees OCD allow pre-agreement administration:	red for; \$ \$ r general admin:	Engineering Fees OC pre basic proj	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$	`_ = = = =
5.	Were grant funds used for a (If Yes , continue.) Consulting Fees OCD allow pre-agreement administration: Amount grantee awarded for the continue of the cont	r general admin:	Engineering Fees OX pre basic pro construc other:	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$	`_ = = = =
4. 5.	Were grant funds used for a (If Yes , continue.) Consulting Fees OCD allow pre-agreement administration:	r general admin:	Engineering Fees OX pre basic pro construc other:	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$,_ = = = =
4. 5.	Were grant funds used for a (If Yes , continue.) Consulting Fees OCD allow pre-agreement administration: Amount grantee awarded for an Performance-Administration and approved activity require	r general admin: ation n 10% or program changes prior written approval. Was	Engineering Fees OX pre basic pro construc other:	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$,
4. 5.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement administration: Amount grantee awarded for the continue of the conti	r general admin: ation In 10% or program changes prior written approval. Was	Engineering Fees Of pre basic project construction other: \$ that delete, add or change a Request for Program	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$	·_ = = =
4. 5. 14. ogr	Were grant funds used for a (If Yes , continue.) Consulting Fees OCD allow pre-agreement administration: Amount grantee awarded for am Performance-Administration Budget changes greater that an approved activity require Amendment submitted? If Yes, was the Program	r general admin: ation In 10% or program changes prior written approval. Was	Engineering Fees Of pre basic project construction other: \$ that delete, add or change a Request for Program	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$,_ = = = =
4. 5. ogr 2.	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement administration: Amount grantee awarded for the superior of the super	r general admin: ation n 10% or program changes prior written approval. Was Amendment approved? n accordance with the time	Engineering Fees OC pre basic project	CD allowed for: -agreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ stion staking: \$ \$	
4. 5. 14. ogr	Were grant funds used for a (If Yes, continue.) Consulting Fees OCD allow pre-agreement administration: Amount grantee awarded for am Performance-Administration and approved activity require Amendment submitted? If Yes, was the Program is the program progressing	r general admin: ation In 10% or program changes prior written approval. Was Amendment approved? In accordance with the time	Engineering Fees OC pre basic project	CD allowed foragreement: \$ engineering: \$ inspection: \$ topo survey: \$ perty survey: \$ testing: \$ ction staking: \$	No.

Publi	c Facilities				
	Enter 'X' if monitoring a street project.				
	Secure a solve o distribution of the contract	(answer: Yes, No or N/A)			
	Enter bid ad publication dates for each prime contractor.	Prime 1:			
		Prime 2:			
		Prime 3:			
2.	Did DHH review/approve plans/specs for the sewer/water pro-			n/a	
1722	If Yes, is DHH's letter dated prior to start of construction?	?		nra	
6.	Budget changes greater than 10% or program changes that	delete, add or change			
	an approved activity require prior written approval. Was a R	equest for Program			
-	Amendment submitted?			n/a	
7,	a. Identify resident inspector:				
	 b. Was inspector's Qualification Certificate sent to OCD price 	or to construction?	-	n/a	
		(annual Van Na at 11/4)		Contractor	17.0
9.	Was ad for hide published once a week for 3 works according	(answer Yes, No or N/A)	1	2	3
10	Was ad for bids published once a week for 3 weeks according Did advertisement for bids include time/place of bid opening?	ng to State Bid Law?			
11		ing?			
	conditions of employment and minimum wages	unA t			
	Section 3 and Section 109				_
	• E. O. 11246		-		_
	 Segregated Facility 				_
12.	~ Did grantee send OCD the itemized bid tabulation?				_
ons	ultant Interview				
-	Physical address	s of city hall or parish courthouse:			
		Was exempt acquisition involved?			
		Number of parcels acquired:			
		ctivity change since original ERR?			
	~ If ye	s above, was the ERR amended?			
		How many subcontractors?			
		have to travel to see the project?			
		Is there current proof of bonding?			
`amn	nents / Description of Project / etc.:				
	et Description:				
nimudele					
-					
rogr	am Amendment(s):				
					_
Budge	et Revision(s):				
770					
hand	ge Order(s);				
-					

-	Acquisition of Property (Part 1)		April 20	17
Gran Reviews		FY:	Туре	:
review	er: LGR:	Date: _	S	
		Yes	No	N/A
-	d application include acquisition by purchase or donation or lease? If Yes, was the acquisition process started after grant award? If No, should the application have included acquisition?	=	\equiv	
	property was acquired for the project prior to the application, should the inform Act have been applicable?			
Co	omments			
Att Do Da	as documentation of ownership or maintenance on file for grantee owned property of der R.S. 9:1253? [i.e., recorded plat map, title, attorney's statement] torney's Name; commentation: atte of Documentation:	r servitude acqui	red	_
	equisition			
	ired from another public agency, temporary construction servitude/easement, volun an 15 yrs.]	tary acquisition, I	eases less	
	as exempt acquisition involved?			
***	as enempt addition involved:			
~	If Yes, identify type of exempt acquisition under A., B., C., and/or D. below.			
A.	Acquisition from another public agency?		<u></u>	
	Identify other public agency:			
	Identify documentation; i.e., title, map, transfer, deed,			
Co	mments:			
B.	Temporary Construction Servitudes or Easements? [OCD recommends this] 1) Is there a signed agreement from all property owners? 2) Does it include provisions for the contractor to survey, layout and construct the service connections?	_		_
Co	mments:			
C.	Leases?	4		
	If long-term lease, is it for a term of less than 15 years including options to exten [Uniform Act applies if lease is 15 years or longer; 14.99 years with an option to			
	[An executed lease must have had prior review from OCD.]			
	[All executed lease must have had prior review from OCD.]			
P	1500 1400 1500 1700 1700 1700 1600 1600 1600 1700			
Cor	mments:	Acquisition (Pa	rt 1\ Box	ne 1 n

D.	Voluntary acquisition?	Yes	_No_	N/
	1) Is there an adopted Voluntary Acquisition Policy?			
	2) Was a public solicitation notice published in the local newspaper prior to any voluntary acquisition activity?			
	If Yes, did the notice explain or were the owners advised that unless the local governing body and the property owners agree on the terms and conditions of the sale, the property could not otherwise be acquired?			_
	~ If No , how was notification achieved?			
	3) Were there at least two properties in the community which met the criteria established for the property to be acquired?			
	If No, then the Voluntary Acquisition process cannot be completed. Did this occur?			
	~ If Yes , why wasn't the Uniform Act followed?			
	How many parcels were acquired using the Voluntary Acquisition process?			
	5) List owners involved:			
	Did an appraisal establish fair market value?			
	If No, was the fair market value of the property established by a person familiar with real estate values in the community?			
	ts / Recommended Corrective Action:			

Acquisition (Part 1) Page 2 of 2

2. Use of page 2. Signification of the page 3. Signification of the page 3. Signification of the page 3. Date 5. Date 5. Date 5. Date 6. When the page 3. Was an		Contra	act #:	FY	THE RESERVE AND THE PARTY AND
Address Use of page 2 Some services Current (Interviews) Signification of the page 4 Current (Interviews) Signification of the page 4 Current (Interviews) Signification of the page 4 Current (Interviews) When the page 4 Current (Interviews)		LGR		Date:	Type:
2. Use of page 2. Signification of the page 3. Signification of the page 3. Signification of the page 3. Date 5. Date 5. Date 5. Date 6. When the page 3. Was an				Date.	
S. Owners C. Current (Interviews) Signification of the control of	ss of property acquired.				
Owners Tenants Current (Intervie Significa HUD re to deter a. Date b. Date c. Whe the r	f property prior to the beginning	of the acquisition pro	ocess.		
Current (Interviews Signification HUD reto determined by Date co. When the recommendation was an arriver was an arriver was an arriver to the reto determined by Date co. When the reto determined the reto determined by Date co. When the reto determined the reto deter	single family residential commercial	industrial other [identify]	non-profit organization	multi-fan	nily residentia
Significa HUD re to deter a. Date b. Date c. Whe the r	rs (Indicate whether occupant).				
Significa HUD re to deter a. Date b. Date c. Whe the r	its.				
HUD re to deter a. Date b. Date c. Whe the r ppraisal Proc Was an	nt address and home and busing riews should be conducted if rev)
b. Date c. Whe the r ppraisal Proc Was an	egulations. Reviewer must revi ermine if the owner was caused	ew the timing of thes an unnecessary han	dship that would warrant neg	any delays in order	1
c. When the representation of the representa	te of Determination to Acquire: (Date of LCDBG App	lication).	-	
the repraisal Proc Was an	te of "Notice of Intent to Acquire	";		-	
Was an	nen a Public Agency Acquired Y notice of land acquisition proce		grantee provided owner with lly the same date as b. above)	
~ If No	ocess				
	n appraisal required?			Yes	No _
	to, explain why an appraisal was untary acquisition; etc.)	s not required.	(i.e., if the value of prop	erty was less than \$	10,000;
-	~ If an appraisal was not cond the documentation used to			an \$10,000, list	
		erenen aves - escrive es leur			

		If Vac continue	Yes	No _	Amt	Date
		If Yes, continue,				
	b.	Was a review appraisal conducted?	Yes	No _	Amt	Date
	C.	Does the appraisal and review apprais on the fair market value?	al disregard ti	he influenc	ce of the project	Yes No
	d.	Do you find the amount determined to conclusion of the fair market value of the		ensation a	n acceptable	Yes No
	e. Was the amount determined to be just compensation less than the grantee's approved appraisal of the fair market value of the property?					
				_ No _	_ Amt	Date
		~ If Yes , explain				
	t:	Were the owners invited to accompany the property?	the appraise	rs on their	inspection of	Yes No
0	alo/F					
	Pu	Donation/Condemnation/Quick Take urchase Offer. Prior to any bargaining, di rms and conditions to purchase his propo	d grantee furnerty at the full	nish owner amount d	a firm written offer etermined to be just	stating all basic compensation?
a	. <u>Pu</u> ter	urchase Offer. Prior to any bargaining, di	erfy at the full	amount d	a firm written offer etermined to be just	compensation?
a	ter	urchase Offer. Prior to any bargaining, di rms and conditions to purchase his prope	erty at the full ects offer.	amount d	etermined to be just	Date
a	ter	urchase Offer. Prior to any bargaining, di rms and conditions to purchase his prope ate owner accepts offer to donate, or reje	erty at the full ects offer. arried out in a	Yes	etermined to be just No anner?	Date
a	ter	urchase Offer. Prior to any bargaining, di rms and conditions to purchase his prope ate owner accepts offer to donate, or reje If donated, was the donation process ca	erty at the full ects offer. arried out in a all and ask how	Yes proper m	etermined to be just No anner? ess was handled.	DateYes No
а	ter	urchase Offer. Prior to any bargaining, di rms and conditions to purchase his proper ate owner accepts offer to donate, or rejet If donated, was the donation process ca > If No, randomly pick 2 donations. Ca - Did the owners indicate they fel compensation?	erty at the full ects offer. arried out in a all and ask how It pressured in	proper may the process with the process waiving	etermined to be just No anner? ess was handled.	Yes No
a b	Py ter	urchase Offer. Prior to any bargaining, dirms and conditions to purchase his properate owner accepts offer to donate, or reject of the donated, was the donation process of the second of the owners indicate they fell compensation?	erty at the full ects offer. arried out in a all and ask how It pressured in	proper may the process with the process waiving	etermined to be just No anner? ess was handled. their right to just	Yes No
a b	Pu ter	urchase Offer. Prior to any bargaining, dirms and conditions to purchase his properate owner accepts offer to donate, or reject of the donated, was the donation process of the second of the owners indicate they fell compensation?	ects offer. arried out in a all and ask hou It pressured in	proper may the process with the process waiving	etermined to be just No anner? ess was handled. their right to just	Yes No
a b	Da Da	urchase Offer. Prior to any bargaining, dirms and conditions to purchase his properate owner accepts offer to donate, or reject of donated, was the donation process of the second of the owners indicate they fell compensation? If Yes, explain.	ects offer. arried out in a all and ask how It pressured in (all parties) f applicable:	proper may the process with the process waiving	etermined to be just No anner? ess was handled. their right to just	Yes No
a b	Da Da	urchase Offer. Prior to any bargaining, dirms and conditions to purchase his properties of the owner accepts offer to donate, or reject of the owner accepts offer to donate, or reject of the owner of the owners indicate they fell compensation? If Yes, explain.	ects offer. arried out in a all and ask how t pressured in (all parties) f applicable: pplicable:	proper may the process with the process waiving	etermined to be just No anner? ess was handled. their right to just	Yes No
a b c d e	Da Da Da	urchase Offer. Prior to any bargaining, dirms and conditions to purchase his proper ate owner accepts offer to donate, or reject of the owner accepts offer to donate, or reject of the owner of the compensation. Carbon of the owners indicate they fell compensation? If Yes, explain. ate final contract entered into: ate condemnation proceedings initiated, if a gate Quick Take proceedings initiated, if a gate of the owners indicated, if a gate Quick Take proceedings initiated, if a gate Quick Take Quick Take Proceedings initiated, if a gate Quick	ects offer. arried out in a all and ask how t pressured in (all parties) f applicable: pplicable:	proper may the process with the process waiving	etermined to be just No anner? ess was handled. their right to just	Yes No

		Acquisition (Pa	rt 2)	Page 3 of 3
Com	ment	ts / Recommended Corrective Action:	Yes	No
9.	pr	eneral Acquisition Process. Based on the available evidence, did the grantee carry out the acquisition occss in a manner that minimized hardships to the owners, and was the grantee consistent with its' patment of other owners? (Section 301)		1990
		Settlement Costs. Has grantee paid all settlement costs as required? (Sect. 303)	Yes	No
	j.	Payment of Just Compensation. Did the owner receive the amount determined to be just compensation for his property? (Section 301)	Yes	No
	b	Summary Statement. Did the grantee provide the owner with a "Statement of the Basis for the Determination of Just Compensation" at the time the grantee furnished the owner with the written purchase offer? (Section 301 (3))	Yes	No

	Conton	Anti-displacement (Part	1)		April 20	17
D.	Grantee:	Contract #:		FY:	Туре	t:
RE	eviewer:	LGR:		Date:		
				Yes	No	N/A
	Is there a Residential Anti-disp	lacement and Relocation file?		100	2/	
	- If Yes, does it contain the f	ollowing information?				_
	 Residential Anti-displace 	ement and Relocation Plan				
	 b. resolution adopting the 	Plan				-
	 Residential Anti-displac 	ement/Relocation Certification				
	d. if applicable, regulation	s, information booklets, relocation clai	m forms			
	Does the Plan identify a persor compliance?	who is responsible for displacement	and relocation			
	~ If Yes, identify:					
2	Was a person or business disp	laced as a result of this program?				
	~ If Yes, complete the Resid	lential Relocation/Displacement Ch	ecklist (Part			_
	 If Yes, was the acquisition s 	subject to the Uniform Act?	ocidat frant			
	 If Yes, complete the Arments / Recommended Corrective 	ti-displacement Checklist (Part 2).				
=		Compliance with National Obje	ectives		April 201	7
7	Grantee:	Contract #		PC.	211	
	ity(ies):	National Objective(s)*:	Verification:	FY:	_ Type:	_
		· · · · · · · · · · · · · · · · · · ·	verincation.			
_						
_			-			
		-				
ome	mente/Paccammandad Committee	Antion:	-			
omr	nents/Recommended Corrective	Action:	1			
			prevention/eliminat	ion of slum and	f blight	
MA	ments/Recommended Corrective / = principal benefit to low-to-mod = principal benefit to low-to-mod = low to moderate job creation/n	derate income persons S/B = derate income clientele U/N =	prevention/eliminat urgent need	ion of slum and	f blight	

Anti-displacement / Compliance w/National Objectives Page 1 of 1

			April 20	/ B. B. /
	Grantee: Contract #:	FY:	Typ	e:
Re	lewer: LGR:	Date:	- 17.5	200
			Yes	No
1.	Does grantee have an adopted Citizen Participation Plan?			
	~ If Yes, was the plan adopted prior to the first public hearing?			
	~ If No , was it prepared before hearing but adopted after hearing w/o changes?			
2	Does the plan			
	 provide citizens with reasonable access to local meetings, information concerning the State's method of distributing funds and the use of funds under Title I? 			
	 provide for LCDBG-related public hearings to obtain views on the development of needs, the review of proposed activities and the review of program performance? 			
	 provide for and encourages participation, particularly persons of low/mod income residing in blighted areas and/or in areas where CDBG funds will be used? 			
	 provide TA to facilitate participation where requested? 			<u> </u>
	 address accommodations at hearings for non-English speaking persons? 			
	 address accommodations at public hearings for persons with disabilities? provide for public hearings to obtain views concerning program amendments? 			
	 Was a program amendment requested and approved? 			
	- If YES, was a public hearing conducted prior to the request?		_	
	provide for a public hearing on performance at closeout?			
			_	-
3,	Does the Citizen Participation Plan include a complaint procedure? — If Yes, does the complaint procedure identify;			
	 how a citizen should file a complaint? 			
	 the manner in which a complaint is processed? 			
	 a response time to the complainant - maximum of 15 working days? 			
4.	If any complaints were filed, was the procedure followed?			
	Comments:			
5.	Did first public notice for the public hearing state the following would be discussed?			
	 amount of funds available for community development and housing needs the range of eligible activities and the estimated amounts for activities that will benefit low/mod income persons 		_	3
	the applicant's plans for minimizing displacement and the provision of benefits should displacement occur		_	
	 information of the applicant's past LCDBG performance 			
3.	Did the potice openius as officers medicularly three of lawford increases and action of			
200	Did the notice encourage citizens, particularly those of low/mod income & residents of slum/blight areas to submit their views on community development and housing needs?			
7.	Did the notice state accommodations would be provided for non-English speaking and disabled individuals?			
3.	Were five calendar days allowed for notification of the public hearing?			

9.	Is there a roster of those in attendance of the public hearing?	Yes	No
10.	Are there minutes of the public hearing?		
	If Yes, do they state the items in #5 above were discussed? (Reference to items is not necessary if no one was in attendance.)	2	
11.	Was the second public notice published: • After the first public hearing was held?		
	 After all forms in the application were dated? 		
	 Prior to application submittal? 		
12.	Was the second public notice published a minimum of 7 calendar days prior to application submittal?	200000	
13.	Was the following information included in the grantee's second public notice? • proposed objectives		
	proposed objectives proposed activities		
	location of proposed activities	-	
	activity amounts	5-10-5	
	application submittal date		
	 the opportunity to comment on the application and the place and time to review the application 	7	
	the application	-	
Comr	nents / Recommended Corrective Action:		
		Citizen Participation P	age 2 of 2

	Civil Rights	April 20	17	
	Grantee: Contract #:	FY:	Тур	ie:
He	eviewer: LGR:	Date: _	-	
Sec	tion 504			
Sun	nmary of Previous Actions Taken	Yes	No	N/A
1.	Has the grantee prepared a "Summary of Previous Actions Taken"?	765	NO	_N/A
	 Does it identify when the grantee conducted its Self-Evaluation? According to the "Summary", did the Self-Evaluation address: 	_		
	Physical Accessibility			
	□ Communications			
	⇒ Employment	_ =		
12000	 Is a copy of the grantees' "Summary of Previous Actions Taken" on file 			
Phy	sical Accessibility			
2.	According to the "Summary of Previous Actions Taken",			
	did Self-Evaluation identify all non-housing facilities owned by grantee?			
	 b. were facilities identified as "new" and "existing"? ("existing" means con altered or designed before July 11, 1988; "new" means after this date.) 			
	c. did the Self-Evaluation identify any physical barriers that impede	· ·		
	accessibility to any programs or activities?			
	 If Yes, continue. d. did the grantee make physical alterations to provide for accessibility? 			
	e. were all physical barriers identified in the Self-Evaluation removed?			
	- If No , continue,			
3.	For "existing" facilities with continuing physical barriers, according to the "S a. have new policies or practices been adopted or existing ones modified revised in order to achieve accessibility such as relocation, home visits, selective alterations? (24 CFR 8.21(2)) b. has community's adopted policies and/or practices been modified to	or	_	
	achieve accessibility for all physical barriers identified? ~ If No, continue.	-	_	_
	c. has grantee determined that making facility accessible and usable by individuals with handicaps would impose either an undue financial and administrative burden, or demonstrated that it would result in a fundame alteration in the nature of the program or activity? (24 CFR 8.21 (b)(l)(li) did the grantee identify any facilities as "new"? — If Yes, edid the grantee identify all "new" facilities as accessible? — If No, inaccessibility must be addressed in Transition Plan below.		=	
Com	nmunications			
4.	According to the "Summary of Previous Actions Taken", a. did the Self-Evaluation identify any impediments to communications accessibility? ~ If Yes, continue.	· <u></u>		
	b. did the grantee adopt policies to remedy impediments?			
Emp	oloyment			
5.	According to the "Summary of Previous Actions Taken",			
	a. did the Self-Evaluation identify any practices discriminatory towards discrepersons? (i.e., advertising, tests, selection criteria, job assignment, or If Yes, continue.			
	b. did the grantee adopt policies to remedy impediments?	- Andrews Co.		O-SATING HER
		Civil Ri	ghts Pa	ige 1 of 4

Cur	ent l	Policies	Yes	No	N/A
6.	a.	does grantee use a functioning TDD or the LA Relay System?			
	ο.	if the LA Relay System is used, is it advertised in the newspaper?			
	ď	does grantee operate a 24 hour emergency service? Based on your observations of the grantee's facilities, are there any obvious	-		
	· u.	areas of non-compliance?			
		does grantee have any disabled employees?		_	
	f	If yes to 6e., are reasonable accommodations made for a qualified applicant or			
	35	employee with a disability? (restructuring/relocating job, modifying			
		schedule, acquiring or modifying equipment, providing reader/interpreter.		_	-
		This can be a policy statement).			
Othe	r Se	ction 504 Requirements, as applicable			
If gra	intee	has less than 15 employees, go to 'Transition Plan'. Otherwise continue.			
7.	a	Has grantee designated a Section 504 coordinator?			
27		Adopted a grievance procedure for complaints alleging prohibited actions?	-		-
	70	(File should include the grievance procedure and resolution adopting it.)			
	C.	Complied with notice in Section 504 handbook which states that grantee "does not discrin	ninata ana	inet	
	-	participants, beneficiaries, applicants, employees or unions or organizations with whom the	illiate aya tev hava	mer	
		collective bargaining agreements, in admission or access to or treatment or employment	treatment		
		or employment in its federally assisted programs or activities"?	o consider.		
		i. If Yes, was the initial notice made within 90 days of receipt of the			
		executed contract and once a year thereafter?			
		ii. If Yes, does notice list the Section 504 coordinator?			
		iii. Note method grantee used to make notification.	_	_	
		20. Calando de maior (persono calando en estador en estado en Variado e Saciente acualidade de Calando en Calando en Calando e Saciente acualidade de Calando en Calando e Saciente Calando e Calan			
Gran	tee's	Transition Plan (Subsequent to Evaluation & original Transition Plan)			
8.	Ha	is grantee acquired an "existing" facility constructed prior to 1988 that is not			
		cessible and will renovate prior to occupying it? OR,			
	Ha	s the U.S. Justice Dept. required the grantee to make a facility physically	7		
	ac	cessible? OR,			
	If e	ither of the above was answered YES, did the grantee complete a self-evaluation for this			
	pro	oject?			
		~ If Yes, continue.			
9	Ha	s a plan been developed listing all steps needed to complete the changes?			
		~ If Yes,			
	a.	Does the plan identify a compliance officer?			
	b.	Does it list handicap resources used in writing the plan?			
		Does the plan identify all impediments?			
	d.	Does it describe how all facilities will be made accessible?			
	e.	Is there a time schedule for rectifying all impediments?			
		Note time period -			
		i. Are the renovations on schedule?			
		ii. If No, should the time schedule be revised?			
Come	nent	A Recommended Corrective Action:		20	24
John	reservite	TI TOO STATE OF THE PARTY OF TH			
			Civil Ri	ahts Pa	age 2 of 4

Equ	al Employment Opportunity			
	\$200454000000000000000000000000000000000	Yes	No	N/A
10.	Are EEO guidelines followed or EEO language included in ads for vacancies?	_	_	
11.	Are EEO posters posted or is an EEO slogan printed on grantee's stationary?			
12.	Is employment data maintained?	Section		
	(EEO-4 form if grantee has 100 or more employees, Workforce Analysis in handbook)			
13,	Has grantee been cited by a state or federal agency for EEO non-compliance or discrimination in hiring?			
Mino	rity Business Enterprise (MBE)			
14.	Did grantee encourage and/or achieve MBE participation? (Methods: SBA, newspaper ads, direct solicitation, divided project into smaller contracts, etc. ~ If No , explain.		_	-
Secti	on 3			
	Section 3 goals: • new hires - 30%		_	
[If gr	 contracting with Section 3 professional services contractors - 3% contracting with Section 3 construction contractors - 10% ant is less than \$200,000, Section 3 requirements do not apply.] 			
15.	is grantee maintaining a certification file for Section 3 employees and businesses? If any Sec. 3 businesses or employees are claimed, the certification must be on file. a. How many Sec. 3 businesses are on file? b. How many Sec. 3 employees are on file?			(<u>-</u>
16.	Did grantee hire employees to work on this project? ~ If Yes , what percentage were Section 3 residents?		_	
17.	Did grantee enter into construction contracts over \$100,000? If Yes, did grantee meet the 10% contracting goal?	_		
18.	If CDBG paid for them, was the 3% contracting goal met for professional services? If contracting or hiring goals for construction and/or professional services contracts were not (Advertisement in newspaper alone is not sufficient for compliance.)	ot met, list	impedime	nts and
	(answer: Yes, No	or N/A)	_	
	Prime Contractors/Subcontractors:	1	2	3
19.	Contractor(s) 'Section 3' Documents [applicable for contracts over \$100,000] a. Was a complete 'Section 3' plan prepared including Tables A & B? b. Section 3 Certification			_
20.	Subcontractor(s) 'Section 3' Documents a. Section 3 and Segregated Facilities Certification [required by all subs] b. Section 3 Plan including Tables A & B [for contracts over \$100,000]		_	
21_	a. Did the prime contractor(s) have any new hires? If Yes, did the contractor(s) meet the 30% goal? b. Did the prime contractor(s) hire any subcontractors? If Yes, did the contractor(s) meet the 10% goal?	\equiv	\equiv	\equiv
	Deline on proposition (ST Tension SQUEET IN TO CONTRACT PROPOSITION (ST TENSION SQUEET ST TENSION SQUE	Civil Rig	ghts page	3 of 4

22.	Did the subcontractor(s) have any new hires? — If Yes, did the subcontractor(s) meet the 30% goal?	Yes	No	N/A
23.	NAMES OF THE PROPERTY OF THE P			
63.	If hiring goals were not met, list impediments and efforts taken by contractors and subcor (Advertisement in newspaper alone is not sufficient for compliance.)	ntractors to cor	npiy.	
24.	Was a complaint made to HUD by a Section 3 resident or business that challenged non-compliance with Section 3 on the part of the grantee, prime or sub? If Yes, explain. a. What is the status of the complaint? b. Was there a finding of non-compliance?	-	===	
25	Did the grantee prepare and adopt a Language Access Plan in the first year of the grant? (beginning FY 2016)			
26.	Has the Language Access Plan been reviewed/updated annually?			
Fair	Housing	171		
27.	Identify actions taken or scheduled to be taken to further fair housing during this project/o (Need 2 activities for 2016 grants and forward)	ontract period.	3	
-		Yes	No	N/A
28.	FAIR HOUSING ASSESSMENT: a. Did the grantee complete the assessment within its jurisdiction?			
	b. Is the assessment complete and are the responses reasonable?			
	 Do all "N/A's" have an explanation or are confirmed by the numbers in 		-	
	Part I of the assessment?			
	d. Does Part II of the assessment indicate the contact or source of information and describe the policies and/or practices?			
	Did the assessment identify any impediments?	-		_
	f. Is Part III marked "N/A" only in the case of Part II		_	_
	being marked "N/A" or "None"?			
	g. Has grantee taken steps to remedy impediments?			
	h. Has the assessment been signed by the Preparer and the CEO?			9
	i. Do grantees' records maintain the assessment and actions taken?			
29.	Have any fair housing complaints been recorded?			
	~ If Yes, explain.			
	a. Was complaint sent to HUD if discrimination was alleged?	5%		
	b. Did grantee notify complainant of HUD's involvement?			
	c. What is the status of the complaint?			
Com	ments / Recommended Corrective Action:			
2011	The state of the s			
_				
		Civil Rights	page 4	4 of 4

		Environmental		April 20	17
Re	Grantee:	Contract #:	FY: Date:	Тур	e:
1.	Were all activitie	es exempt from the environmental review process?	Yes	No	N/A
	~ If No , cor	mplete remainder of checklist.			
2.	Did any tribe req	quest to be a consulting party?	32		
	~ If Yes, who	at were the conditions of their request?			
	- Were the	conditions of their request met?	-		
3.	(View Site)	or project site changed since review of the ERR and/or grant appli as the ERR amended and sent to OCD for review?	ication?		-
	~ If Not , no	ete the date an amended ERR will be submitted:			
4.	Did the Historic F during constructi	Preservation Officer request additional information before or ion?			
	- If Yes, is the	re documentation to show compliance?			-
Com	ments / Recommen	nded Corrective Action:			

Environmental Page 1 of 1

R	6	7 1110	ncial Management		April 20	17
150	Grantee:		Contract #:	FY:	Тур	e:
	eviewer:		R:	Date:_	- 84	
in	ancial Reporting	Reference: 2 CFR	200.302(a)			
			- Control of the Cont	Yes	No	N/A
ş	Does grantee have add Expenditures & Chang	equate financial records? es in Fund Balance and B	[Statement of Revenues, alance Sheet or General Ledger]			
2	Are the YTD financial r	ecords reasonably current	?	2		
į.	Are the financial record	Is accurate?		-		
	Are there any delinque	nt annual financial reports	?		-	
	Does grantee have mo	re than one open LCDBG	grant?			
	 If Yes, are they accord 	counted for separately?				
8	Has program income b	nan manisad?			11	
ė	~ If Yes has it been i					
						_
cc	ounting Records	Reference: 2 CFR 200.3	002			
Š	Does grantee properly incur costs, program an	maintain program records' mendments, budget revisio	? [contract, authorization to	Yes	No	N/A
	incur costs, program an Authorizations	nendments, budget revision and Awards	? [contract, authorization to ons, etc.]	Yes	No_	N/A
	Authorizations Authorization	and Awards to Incur Costs letter:	ons, etc.]	Yes	No	_N/A
	Authorizations Authorization First a	and Awards to Incur Costs letter:	ons, etc.]	Yes	No	_N/A
	Authorizations Authorization First a	and Awards in to Incur Costs letter: idministrative invoice: Period covered:	ons, etc.]	Yes	_No_	_N/A
	Authorizations Authorization First a	and Awards and Awards to Incur Costs letter: administrative invoice: Period covered:	ons, etc.]	Yes	No	_N/A
	Authorizations Authorization First a	and Awards in to Incur Costs letter: idministrative invoice: Period covered:	ons, etc.]	Yes	No	_N/A
om	Authorizations Authorization First a Re First Was there evidence co	and Awards and Awards and Incur Costs letter: administrative invoice: Period covered: lease of Funds letter: construction invoice: Period covered: sts (other than approved p	Dates Dates Fe-agreement costs) were	Yes	No	N/A

nter	nal Controls Re	ference: 24 CFR 85.20 (b)(3)			200288 780	
9.	Were there internal cont most recent audit?	rol findings relevant to the CDBG p	rogram in the		Yes N	0 N/A
0,	Does the internal control financial management qu approval of invoices recording of LCDBG signing of the checks	financial transactions	ons made in the		==	
1.	Are there two signatures	on the checks?				
2	Are checks pre-signed?					
3.	Are all employees handli	ng financial transactions bonded?				
						_
	ments / Recommended Cor	TSACK (ACCC) 100 (EX 7A/200				
ludg	get Control Refere	nce: 2 CFR 200.302(5)				
	Budgeted Activities	Original Budget	Current (R	EVISED) Budget	Expenditur	es to Date
		Amount Drawndown	RFP#	Revenue R	eported	7
	FYE:					
	FYE:					
	FYE:					
	FYTD:					7
						_
	Ledger Cash Balance	Date	Bank Statem	nent Cash Balance	Dat	e
					COR	ē
4.		ies in the reporting of revenues and	d expenditures			
4.	Are there any discrepand and the approved budget		a expenditures	,		_
		?	a expenditures			_
4. Omr	and the approved budget	?	a expenditures	,	== 13=	
	and the approved budget	?	a expenditures	,		
	and the approved budget	?	a expenditures			

LCDBG | Program Evaluation & Monitoring Plan

Last Modified: 12/12/2019

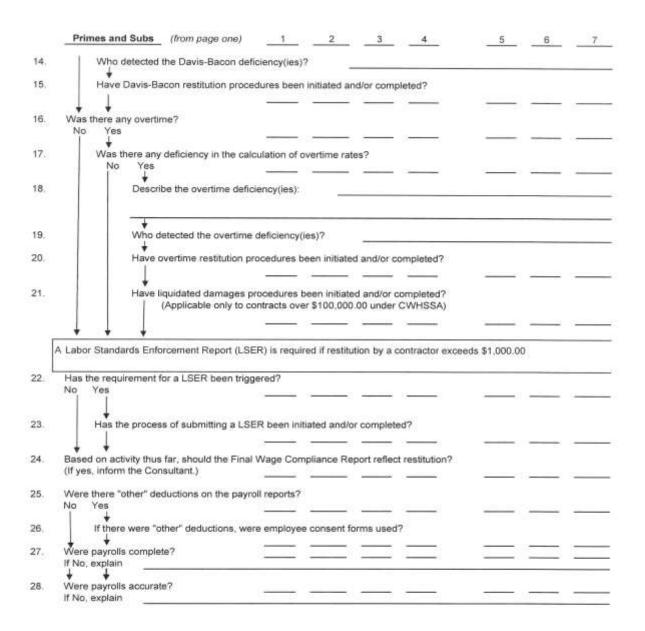
	vable Costs	Reference: 2 CFR 200.	320			22.5	N/-	84/6
15.	Were purchases to A-87 regulatio	s of supplies and leasing o	of equipment justif	ied according			No	N/A
Com	ments / Recommer	nded Corrective Action:						
Sour	ce Documentation	n Reference: 2	CFR 200.302					
6,	Are accounting r documentation?	ecords [journal entries] su [cancelled checks, i			_ <u>Ye</u>	15	No	N/A
7.	with time sheets	ime charged to the LCDB and/or other source docu- ie transactions regarding on grecords?	ments?		_	_		_
om	ments / Recommer	nded Corrective Action:						
ast	Management	Reference: 2 CFI	R 200.305					
		e-printed and pre-number deposited in the LCDBG	account?			= :		
1.	Are bank statem		account? elpt?	Dollar Amt.	Check Written		Check Cl	eared *
1.	Are bank statem	deposited in the LCDBG ents reconciled upon rece e of a violation of the '3-da	account? hipt? ny rule'?	Dollar Amt.	Check Written		Check Cl	eared *
1.	Are bank statem is there evidence	deposited in the LCDBG ents reconciled upon rece e of a violation of the '3-da	account? hipt? ny rule'?	Dollar Amt.	Check Written		Check Cli	eared *
1.	Are bank statem is there evidence RFP#:	deposited in the LCDBG ents reconciled upon rece e of a violation of the '3-da	account? hipt? ny rule'?	Dollar Amt.	Check Written		Check Cli	eared *
1.	Are bank statem is there evidence RFP#: RFP#: RFP#:	deposited in the LCDBG ents reconciled upon recess of a violation of the "3-da" Date Rec'd If more than 30 days has	account? eipt? ny rule'? Check #	explanation must t	pe requested in writin	9		
1. 2.	Are bank statem Is there evidence RFP#: RFP#: RFP#:	deposited in the LCDBG ents reconciled upon rece of a violation of the '3-da Date Rec'd Date Rec'd If more than 30 days has ion:	account? eipt? ty rule'? Check #	explanation must t	pe requested in writin	g		
1. 2.	Are bank statem is there evidence RFP#: RFP#: RFP#:	deposited in the LCDBG ents reconciled upon recess of a violation of the "3-da" Date Rec'd If more than 30 days has ion: sement: Check	account? eipt? ry rule'? Check #	explanation must t Account Nu Date	pe requested in writin	g nount		
21. 22. 23.	Are bank statem is there evidence RFP#: RFP#: RFP#: Financial instituti Last cash disburi	deposited in the LCDBG ents reconciled upon recess of a violation of the "3-da" Date Rec'd If more than 30 days has ion: sement: Check	account? eipt? ry rule'? Check #	explanation must t Account Nu Date	pe requested in writin	g nount		

		Yes	No	N/A
25.	Were the grantee's accounting records and financial practices sufficient to: a. permit the preparation of required financial reports? (2 CFR 200.302(a))			
	and / or			
	 permit the tracing of LCDBG funds to establish that such funds have not been used in violation of the restrictions & prohibitions of applicable 			
	statutes and regulations? (2 CFR 200.302(a))		_	
	What are the specific problems?			
	If No , inform grantee funds cannot be requested or disbursed until deficiencies are corrected.			
omr	nents / Recommended Corrective Action:			
_				
_				
_				
	Financi	al Managemer	nt Pag	e 4 of 4
	Financi	al Managemen	nt Pag	e 4 of 4
	Financi	al Managemen	nt Pag	e 4 of 4
	Financi	al Managemen	nt Pag	e 4 of 4

		Li	bor Standar	ds		April 2017
Grantee:			Contract #		FY:	Type:
Reviewer.		LG	R:		Da	te:
Force Account						
~ If Yes, did g	rantee folio e guideline	itten approval from OCE w the "LCDBG Guidelin s to review.] owing:			Ye	s No N/
		Prime Contractor	1 Pri	me Contractor 2	Prime (Contractor 3
Cor	ntractor					
Bid Openir						
Date of El						
Date of Contract						
Lock-	In Date					
Total Contract	Award					
Work Desc	cription					
A. Decisio						
Effective Dec						
Effective	Mod#					
Effective Issu	ue Date					
	n Type					
Effective Dec						
Effective			9			
Effective Issu	ue Date					
	Prin	ne 1 Interviews	Prime 2	Interviews	Prime 3	nterviews
Employee		ine I musi riono	771110	III.C. TIONS	T time g	INCI VICING
Interviews						
List Worker						
Classifications and	j					
Rates as						
Determined by	2 =					
Employee						
Name of Sub(s)	4			T 5		
name or easter	-					
Employee						
Interviews						
	(<u>-</u>					
Name of Sub(s)	6			Z		
TITTE NO. SOFTWA						
Employee						
Interviews						

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Prin	nes and Subs	(from page one)	_ 1	2	3	4	5	6
	interviews co efined on page							
	weekly payro rly reviewed?	lls submitted and						
	vritten authoriz	ner/officer or a person tation sign the						
		rts provide the basic ele k performed, worker cla				Chicago and Committee	Yes	No_
		ion(s) have all job class project type, site visits,		eded by ea	ch contra	ctor based on	factors such as	i
1	+		- 5		(A) = 02		-5	
	Were proper	additional classification	s requeste	d?				
1	1) 	$\overline{}$		-		
	e payrolls (or rly classify wo	corrected payrolls) rkers?		s				
Did th	e wage decisi	on(s) require fringes for	any classi	fication use	d by each	contractor?		
No	Yes							
	+							
	Yes No	e required, did the cont	ractor chec	k Box 4-b ir	idicating p	ayment in cas	n?	
	1 +		-			-		
	V 45.33.35	Box 4-a indicate fringe b	enefit payn	nent(s) into	an approv	ed plan?		
	No	Yes			-			
	1 1	▼ When answering #12 be	low, allow	credit for no	more that	n the fringe an	nount listed on	the
		age decision unless a s						
					all falls as			
		there any reason to ful Yes No	ther invest	igate Box 4	-a minge	payments?		
		1 1						
. +	_ + _ +			name at		action of the second		
Were Yes	No.	compensation requirem	ents met?			ike restitution)		
163	1.0							
	Describe def	iciency(ies):						
11.								



Labor Standards Page 3 of 4

	Prime Contractors Only (answer: Yes, No or N/A)	1_	2	3
29.	Did the local government receive a fully executed Verification of Wage Decision and Contractor Eligibility form from OCD prior to the award of the construction contract? Yes No			
30.	Does a resolution from the local government state that the award will be contingent on verification of wage decision and contractor eligibility?		2	
	. * . *			
31.	Was the "Notice of Contract Award" sent to OCD? No Yes L			
32.	Was the Notice of Contract Award rec'd by OCD within 30 days of the award date?			-
550	- Aun Tara Maria (1902 - 1902		50	
33	Was the construction contract awarded more than 90 days after bid opening?			
34.	Was the <u>proper</u> wage decision made a part of the construction contract?			_
35.	Was the Project Wage Rate Sheet or the Wage Decision, one of the two, accessible?			
	Employee Interviews			
	riews shall include employees of the following contractors: All Prime Contractors and any subcontractor with a contract of \$100,000 or more Subcontractors with a large number of payroll problems with contracts of less than \$100,000 Other subcontractors, not listed above, that are on the jobsite on the date of the above interviewerson of each classification present on the interview date(s) and 50% of all laborers should be interviewed.		d.	
(Comments / Recommended Corrective Action:			

Labor Standards Page 4 of 4

-	Constant	Procurement	100.0	April 2017
	Grantee: viewer	Contract #	FY: Date:	Type:
	September 19 No. 10 No.	m 86	Date	
	Did the grantee adopt the State's sample pr	rocurement policy?	Yes	No
	~ Date adopted:	(If prior to 2015, they mu	st re-adopt.)	
	Date contractor(s) cleared, if applicable:			
	~ Is clearance date before contract date?	Yes No Yes	and the second s	Yes No_
	If grant funds were used for all or part of a p is there an active DUNS number for the administrative consultant engineer prime contractors	professional service contract(s),	Yes	No N/A
	 subcontractors 			
	Were grant funds used for all or part of a pro- If Yes, complete Professional Service C Construction Contract portion		Yes	No
0	FESSIONAL SERVICES CONTRACTS: Identify all professional services contracts exceeds the amount(s) allowed by OCD.	s executed by grantee. Determine whether	a line-item contra	act amount(s)
80	Identify all professional services contracts	s executed by grantee. Determine whether <u>Contract Amount:</u>		oct amount(s)
	Identify all professional services contracts exceeds the amount(s) allowed by OCD.			
	Identify all professional services contracts exceeds the amount(s) allowed by OCD.		OCD App	
	Identify all professional services contracts exceeds the amount(s) allowed by OCD.	Contract Amount:	OCD App	proved Amount
	Identify all professional services contracts exceeds the amount(s) allowed by OCD. Administrative Consultant	Pre-agreement	OCD App	proved Amount:
	Identify all professional services contracts exceeds the amount(s) allowed by OCD.	Pre-agreement Administration	OCD App	proved Amount: "re-agreement Administration
	Identify all professional services contracts exceeds the amount(s) allowed by OCD. Administrative Consultant	Pre-agreement Administration Contract Amount:	OCD Apr	proved Amount:
14	Identify all professional services contracts exceeds the amount(s) allowed by OCD. Administrative Consultant	Contract Amount: Pre-agreement Administration Contract Amount: Pre-agreement	OCD Apr	proved Amount: Pre-agreement Administration proved Amount: Pre-agreement
	Identify all professional services contracts exceeds the amount(s) allowed by OCD. Administrative Consultant	Contract Amount: Pre-agreement Administration Contract Amount: Pre-agreement Basic Engineering	OCD App	proved Amount: "re-agreement Administration proved Amount: "re-agreement sic Engineering
14	Identify all professional services contracts exceeds the amount(s) allowed by OCD. Administrative Consultant	Contract Amount: Pre-agreement Administration Contract Amount: Pre-agreement Basic Engineering Inspections)	OCD Apr	proved Amount: Pre-agreement Administration proved Amount: Pre-agreement sic Engineering Inspections
ě	Identify all professional services contracts exceeds the amount(s) allowed by OCD. Administrative Consultant	Contract Amount: Pre-agreement Administration Contract Amount: Pre-agreement Basic Engineering Inspections) Topo Survey	OCD Apr	proved Amount: Topo Survey
ě	Identify all professional services contracts exceeds the amount(s) allowed by OCD. Administrative Consultant	Contract Amount: Pre-agreement Administration Contract Amount: Pre-agreement Basic Engineering Inspections) Topo Survey Property Survey	OCD Apr	proved Amount: The agreement Administration proved Amount: The agreement are Engineering Inspections Topo Survey raperty Survey

	Other Professional Service Contractors:		2	Contract A	mount:
	c) Testing:		s		
	Appraiser:		\$		
	Review Appraiser:		\$		
	Legal:		5		
	Auditor:		s		
Rev	riew all Non-Competitive Negotiation contracts and a sample of t	he others.	3-2		
6.	For the <u>Small Purchase</u> method, does the file have (an option when fees are less than \$100,000)	Consultant	Engineer	Other	Other
	 a minimum of 3 quotes rec'd by phone, fax or mail documentation for basis of selection 	-			
		-			-
7.	The Competitive Negotiation method.				
	 Using "Requests for Proposals", does the file have a copy of the Request for Proposal? 				
	 Was RFP published in nearest MSA newspaper? 			-	-
	 copies of proposals received? 				
	 a written evaluation of each proposal received? evidence costs were reviewed for reasonableness 				
	 evidence the selection process was thorough and uniform and the criteria & point system identified in the RFP was used to make the selection? 				
			51000148	-	
	 Using "Statements of Qualifications", does the file have Was the request published in nearest MSA newspaper? copies of statements received? 	120	_		
	 a written evaluation of each statement received? 	275.55		1.00	
	 evidence costs were reviewed for reasonableness? evidence the selection process was thorough and uniform and the criteria & point system identified in the RFP 	200		750	
	Qualification Statements was used to make the selection?	135080			
3.	For the Non-competitive Negotiation method, does the file have	***			
	 rationale for using this procurement method? justification for services provided? 				
	evidence costs were reviewed for reasonableness?				_
	 prior OCD approval? 			=	
	(answer: Yes, No or N/A)	Consultant	Engineer	Other	Other
3.	Does the contract include the following: scope of services	Oonaditant	Litgineer	Other	Other
	 contract amount, with breakout of fees by services 				
	 method of compensation 				
	 contract date (make note of) Access to Records Clause 				
	Access to records clause			_	
0.	Are the following federal contract provisions included:				
	 Contracts for more than simplified acquisition threshold 	5R	<u></u>		
	Cause and Convenience				
	Rights to Inventions Made Under a Contract				
	 Clean Air Act and the Federal Water Pollution Control Act Debarment and Suspension 				
	Byrd Anti-Lobbying Amendment				
	/ assaying randingine		Procurer	nent Pa	ge 2 of 3
				1.90	Section of the

11.	Was contract amended?	
	~ If Yes, why?	
12.	Was contract(s) executed (signed) by all parties before work was initiated(including pre-agreement activities)?	
	~ If No document dates involved:	
13.	Does consultant's contract stipulate 10% of contract amount will be held until program is conditionally closed?	Yes No N/A
14.	Amount awarded grantee for general admin less pre-agreement: (Example: \$35,000 Admin total for consultant plus local government.) — Did grantee hold 5% for their administrative expenses?	s
		Procurement Page 3 of 3

	Program Performance-Administration		April 2017
Grantee:	Contract #:	FY:	Type:
Reviewer:	LGR:	Date:	
ontract End Date:	Percent Drawn To- Date:	0.0000000000000000000000000000000000000	
Is the program p	rogressing in accordance with the current time schedule?		
~ If No. list the	activity(ies) that is behind schedule and explain why.	-	
in the place of the	about sylves / that is belief of schedule and explain willy.		
Activity:	Reason for delay:		
Walana and a			
Activity:	Reason for delay:		
Do you think the	grantee can meet the current time schedule?		
~ If No, explain			
Was a revised so	chedule discussed?		
Are there probler	ns which could make the overall program infeasible?		
, se are product	William obdite make the overall program measure :		
Grantee:	Record Keeping Contract #:	FY:	April 2017
Grantee:	Record Keeping Contract #:	FY:	April 2017 Type:
	Contract #:		
Were the local go	Contract #:		Type:
Were the local go	Contract #: overnment's files available for review, (not the grant consultant's) and doe im follow the model provided in the grantee handbook?		Type:
Were the local go	Contract #:		Type:
Were the local go	Contract #: overnment's files available for review, (not the grant consultant's) and doe am follow the model provided in the grantee handbook? find information or documentation during the review?		Type:
Were the local go CDBG filing syste Was it difficult to ~ If Yes, explain	Contract #: overnment's files available for review, (not the grant consultant's) and does am follow the model provided in the grantee handbook? find information or documentation during the review?		Type:
Were the local go CDBG filing syste Was it difficult to ~ If Yes, explain Does grantee has	Contract #: overnment's files available for review, (not the grant consultant's) and doe am follow the model provided in the grantee handbook? find information or documentation during the review?		Type:
Were the local go CDBG filing syste Was it difficult to ~ If Yes, explain Does grantee has a final closeout in	Contract #: Evernment's files available for review, (not the grant consultant's) and doe am follow the model provided in the grantee handbook? find information or documentation during the review? The another active grant, conditionally closed grant or grant that received the last four years?	es their	Type:
Were the local go CDBG filing syste Was it difficult to ~ If Yes, explain Does grantee has a final closeout in	Contract #: overnment's files available for review, (not the grant consultant's) and doe an follow the model provided in the grantee handbook? find information or documentation during the review? a: oe another active grant, conditionally closed grant or grant that received the last four years? oe local government's CDBG grant files and review past monitoring letter	es their	Type:
Were the local gr CDBG filing syste Was it difficult to - If Yes, explain Does grantee has a final closeout in - If Yes, view the repetitive defice	Contract #: overnment's files available for review, (not the grant consultant's) and doe am follow the model provided in the grantee handbook? find information or documentation during the review? n: over another active grant, conditionally closed grant or grant that received the last four years? over local government's CDBG grant files and review past monitoring letter diencies.	es their	Type:
Were the local go CDBG filing syste Was it difficult to ~ If Yes, explain Does grantee has a final closeout in ~ If Yes, view th	Contract #: overnment's files available for review, (not the grant consultant's) and doe am follow the model provided in the grantee handbook? find information or documentation during the review? n: over another active grant, conditionally closed grant or grant that received the last four years? over local government's CDBG grant files and review past monitoring letter diencies.	es their	Type:
Were the local gr CDBG filing syste Was it difficult to - If Yes, explain Does grantee has a final closeout in - If Yes, view the repetitive defice	Contract #: overnment's files available for review, (not the grant consultant's) and doe am follow the model provided in the grantee handbook? find information or documentation during the review? n: over another active grant, conditionally closed grant or grant that received the last four years? over local government's CDBG grant files and review past monitoring letter diencies.	es their	Type:
Were the local gr CDBG filing syste Was it difficult to If Yes, explain Does grantee has a final closeout in If Yes, view the repetitive defice	Contract #: overnment's files available for review, (not the grant consultant's) and doe am follow the model provided in the grantee handbook? find information or documentation during the review? n: over another active grant, conditionally closed grant or grant that received the last four years? over local government's CDBG grant files and review past monitoring letter diencies.	es their	Type:

Reviewer	8		Contract #	FY:	Typ	e:
		1				
Contract			.GR:	Date:		
	tor <u>1</u> :			Contract Amount:		
Contract	tor 2:			Contract Amount:		
				Contract Amount:		
		Contractor 1	Contractor 2	Contract	tor 3	
The second secon	Ad Dates		W			
Bid Open	ard Date					
Description			11			
		(answer: Yes , No ate for Compliance with Min e Physically Handicapped?	imum Standards for	tractors: 1	2	3
b. H	as the State Fire	Marshall issued a 'certifica	ate of occupancy'?			
Did D	HH review/appr	ove plans/specs for the sev	wer/water project?			
~ If	Yes , is DHH's le	otter dated prior to start of o	construction?			
* Isap	roject sign prom	inently displayed in each ta		1977/2007 1 2		
do su	es the residents	ook-ups or service line rep; s'application for services in of annual income? (zations obtained from the p	*Program Perf airs to L/M income families, clude documentation which	ormance		
		The second of th	*National Obje	ctive		
• Were	snecial assessr	ments levied on property ow				
T 1000000000	t? (hook-up or	tap-on fees)	rners as a result of this *Program Perf	ormance		
an act	tivity require price	than 10% or program char or written approval. If applic submitted to OCD?	nges that delete, add or change	1921 II V 258		
a. Ide	entify resident in	spector				
b. Wa	as inspector's <u>Q</u>	ualification Certificate sent	to OCD prior to construction?			
Are in:	spection reports Yes , are they sig	available for review? aned by the inspector identi	fied above?		_	<u> </u>
Was a	ad for bids publis rst ad must appe	shed once a week for 3 wee ear at least 25 days prior to	ks according to State Bid Law? bid opening.)	(
Did ad	tvertisement for	bids include time/place of b	oid opening?			
* cor	fvertisement for nditions of emplo ction 3	bids call bidders attention to syment and minimum wage	o the following? s			
	O. 11246					
	gregated Facility	e e e e e e e e e e e e e e e e e e e	*Civil Rights			
20,500,500				c Improvements	Dine	e 1 of

12.	(answer: Yes, No or N/A) Were there minutes of the bid opening and a tabulation of bids? ~ Did grantee send OCD the itemized bid tabulation?	Contractors:			3
13.	Did the selected bidder provide a signed attestation document re- criminal convictions & verification of employees?	past		_	
14.	Was a bid guarantee equivalent to 5% of bid submitted by the low (bid bond, certified check)	est bidder?			
15.*	Did bid/contract document contain the following? a. Federal Wage Decision(s) - #'s b. Federal Labor Standards Provisions				
		a-b Labor	_		
	 c. EO Provisions (A.) for contracts not subject to EO11246 d. EO Provisions (B. & C.) for contracts subject to EO11246 (must have goals included for minority and female participation e. Section 3 Compliance for Training, Employment, Business Operation 	[\$10,000 & under] [above \$10,000] nortunities :-e Civil Rights	=	=	=
	Access to Records/Maintenance of Records Conflict of Interest Bonding and Insurance Requirements	above \$150,000]	\equiv	=	
16.	Were bid/contract documents reviewed by grantee's attorney?	-j Procurement			
17.	If applicable, were copies of all addendum(da) sent to all bidders &	LOCD?			
18,*	Contractor(s) 'Section 3' Documents? [applicable for contra a. Was a complete 'Section 3' plan prepared including Tables A & b. Section 3 Certification	acts over \$100,000] B?		_	
19,*	Subcontractor(s) 'Section 3' Documents a. Section 3 and Segregated Facilities Certification? [re b. Section 3 Plan including Tables A & B? [for contracts]	civil Rights equired by all subs over \$100,000]		_	
20.	is there a performance bond and a payment bond for the contract a				
21.	Were the U.S. Treasury Dept. and the LA Insurance Commissione contacted regarding the surety company?	r's Office			
22.	Was the contract awarded to the lowest responsible bidder?		0.000		
23.	Did the contract document include all items contained in the bid pa- was it executed by the contractor?	ckage and			
4.	Was the contract awarded within the time frame established in Stat [45 days; time frame may be extended in 30-day increments by mu	te Bid Law? itual consent.]	10 - 21		
5.	Were change order(s) approved by OCD prior to execution by gran				
		Dublic Impensor	onte	De	

26.	(answer: Yes, No or N/A) Contractors: Was a copy of the executed change order with all necessary signatures submitted to OCD?	1	2 3
27.	Has there been a final inspection of work?	200 - 200 -	
28.	Has the 'Certificate of Substantial Completion' been recorded?		
29.	Has final payment been made to contractor less retainage?		
30.	Has the 'Clear Lien Certificate' been issued?		
31.	Has contractor been paid their retainage?		
Comi	Will grantee transfer ownership of system to another entity? — If Yes, was this approved during application review? — If Yes, has an intergovernmental cooperative agreement been executed? ments / Recommended Corrective Action:	Yes Yes Yes	No No No
NOTE	: Unless otherwise noted with an asterisk (*), questions on the Public Improveme rement compliance area.	nts Checklist are in t	he
***********	25 PM 2010 PM	provements	Page 3 of 3

	Exit Conference	April 2017
Grantee:	Contract #:	LGR:
Program Areas Reviewed	Identify Problems to b	ne Corrected
	taning , remains to a	00110000
Acquisition (05)		
Anti-displacement (14)		
Citizen Participation(13)		
Civil Rights: 504 / EO /		
MBE/Sec. 3/FH (04)		
Economic Development (14)		
Environmental (02)		
Environmental (02)		
man annual arthur		1
Financial Management (01)		
Labor Standards (03)		9
2000 000 000 (00)		
National Objective (10)		
Program Performance-		1
Administration (09)		
Procurement (08)		
		1
Public Improvements		
2010-00-0-00-0-0-0-0-0-0-0-0-0-0-0-0-0-0		1
Record Keeping (12)		

Specialized Monitoring Checklists

- 1. Economic Development, Part 1
- 2. Economic Development, Part 2
- 3. Housing Rehabilitation, Part 1
- 4. Housing Rehabilitation, Part 2
- 5. Clearance/Demolition
- 6. Relocation, Part 1
- 7. Relocation, Part 2
- 8. Antidisplacement, Part 2

LCDBG | Program Evaluation & Monitoring Plan

		ECONOMIC DI	EVELOPMENT (part	1)			
						Novembe	r, 1996
Grant			Contract #:	FY:_			
Revie	wed By:	LGR:		Date:			
Comp	any Name:						
Addre	PSS:						
Respo	onsible Official:						
Activi	ty Description:						
	-						
	-						
-	participants are accers program.)	ceptable as low/modera	te beneficiaries exc	ept those partici	pants on t	the dislocate	ed
1.	Date of last finan	ncial review	for the period e		<u>No</u>	<u>N/A</u>	
		ws conducted to date:		8	·		
		al statement review		iod ending			
2.		s loan to the developer b					
	the manner desc	ribed in Exhibit D of our	contract with the c	ontractor?			
	comments.						
3.	In general, have	all currently applicable p	provisions of our co	ntract with			
	the grantee beer	carried out as describe	d, especially Exhibit	s A - E?			
	Comments:					,	
Econo	omic Development (Part 1)			Page	1 of 2	

	VERIFICATION OF JOBS CREATED AND/OR RETAINED			
4.	Number of jobs to be created and/or retained as stated in contract:			
5.	Review payroll prior to grant award, if applicable. Mainly or expansions. Date of payroll: Number of existing jobs:			
6.	Review current payroll. Date of payroll: Number of existing jobs:			
7.	Review job certifications. a) Number of jobs to be created and/or retained: b) Number of jobs given to persons of low/moderate income households: c) Number of jobs given to low income households: d) Number of jobs given to high income households:	=		
8.	Does the current payroll match the job certifications?Yes	_No	N/A	
9.	What is the low/moderate income limits for this locality? \$	-		
10.	What is the percent of low/moderate new hires?			
11.	Has this grant met its job creation goals?Yes ~ If No, explain:			
12.	LCDBG funds less administration \$ divided by total number = cost per job \$.			
13.	Was the National Objective met?Yes	No	N/A	
14.	Is another monitoring visit required to verify job creation and compliance with theYe	he Natior	•	
* If Yes, in this a	, plan a second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send a letter to the grantee informing them of the second monitoring visit $\&$ send $\&$ second monitoring visit $\&$ send $\&$ second monitoring visit $\&$ second monitoring v	their lack	c of com	pliance
	All other applicable monitoring checklists must be completed. (i.e., Program Perfo Financial Management, Labor Standards (if Davis-Bacon is applicable)		, FH/EO,	_
Econom	nic Development (Part 1)	Page 2 o	of 2	

			ilitation (Part				ay, 2004
G	rantee:		ontract#:				
æ	viewer:	LGR:	:		Date:_		
L	Number of units approved for:			lumber of units:			
-		(Rehat	oilitation)			ehabilitate	ed)
		(Replacement)	Reconstruction)		(Replac	ed.Recore	fruc ie d)
		Dem	olition)			emolis he	
	Demoli	•	oth vacant demoli	lion and replace	•		•
				•			-
					Yes	_Mo_	WA
_	Does it appear the proposed re	:hab/seplaceme	enli reconstruction	/demolition will			
	be completed?						
	~ If Alo, explain.						
	· · · —						
L	Are the program guidelines bei		d in a dobumd la				
_	program being used?	ny novem an	u, is a uccesso io	анграумся.			
	- If Yes, is the property being	legally liened	?				
-	Are individual files being maint	ained for each	rehabilitated unit?	•			
	1475-4-4-4-4						
Ĺ	What standards are being use	o to ocazanime	me edem offen			y:	
Ĺ	Did adverlisement call bidders	alleation to;		d Section 109			
			⁴ E. O. 11246 ⁴ Segregated F	ar di u			
			Segregateu r	acany			
<u>.</u>	Are sile inspections used for ass	suring limely co	mplefion ofwork a	nd payments?			
	a) Who performs the inspection	ms ?					
	Li Milet in Sein mire emeries	2					
	b) What is their prior experien						
5 .	a) What is the average cost p	eı	1	b) Are these com	s is tent wi	h the appl	lication?
			illeli on)	•		••	
		(Replacement)	Recoreilruction)				
			ulifori)				
		(LEN					
	~ If Alo, explain.						

		Yes	Mo	MA
	Did any individual grantfoan exceed the locally determined maximum average			
	amount, if applicable?			
	~ If Yes, explain.			
	ments / Recommended Corrective Action:			
	ising Rehabilitation Plan Have Rehabilitation quidelines (policies/procedures) been developed and			
•	approved by the local governing body?			
L	Do the guidelines			
	state eligibility requirements for participation including household income,			
	assets, ownership, occupancy, need for Rehabilitation, geographical boundaries, rehabilitation feasibility, etc.?			
	establish a maximum average grant and/or ban limitation considering the c	oedilioe		
	of the targeted housing stock and the needs of the Program clientele?			
	' identity a property rehabilitation standard? (Section 8 Housing Quality			
	Standards, Southern Standard Housing Code, local housing code, etc.)			
	* require each Rehabilitated unit to comply at a minimum with the Section 81	Housing		
	Quality Standards and Cost Effective Energy Conservation Standards?			
	· require each unit to comply with the Fire Administration Authorization Act			
	of 1992? (at a minimum, installed 2 hard-wired and/or ballery operated smale detectors)			
	* establish procedures to ensure compliance with the Lead-Bessel Paint regulations?			
	dealy identify eligible Rehabilitation costs?			
	 define the roles and responsibilities of program staff and the property owner 			
	and contractor through all phases of program delivery?			
	i include or reference all procedures and bans for application processing and financial and construction management?			
	* if applicable, establish a coordinated relationship with the local code			
	enforcement program?			
	' include softone to recruit and seeist contractors? (small, minority and/or female)			
	include minimum qualifications for contractors, and provide for the evaluation	_		
	of contractor credentials, including the contractor's licens efregistration number's			
	include appropriate measures to deny participation to contractors who fail to			
	perform in a satisfactory manner?			
	* require the preparation of a detailed workwrite-up and cost estimate for each unit?			
	include general Rehabilitation specifications that adequately prescribe			
	materials, methods and workmanship quality?			
	include a grievance procedure or other mechanism to correct deficiencies in			
	the Housing Rehabilitation program after final inspection?			
:o=	ments / Recommended Corrective Action:			

	Housing Rehabilitation (Part 2) May, 2004								
Gra	ntee: Contract #: FY: Type:								
Rev	riewer: LGR: Date:								
This	This checklist must be completed for each unit reviewed.								
Own	Owner/Occupant (Head of Household)								
Add	ress								
Deffe	ered loan amount \$								
Che	ck all that apply: single family duplex upper income HH low/moderate income HH								
	Number of units in structure undergoing rehabilitation								
	Date of final verification of all household application data								
	Date work write-up and cost estimate prepared								
	Date of advertisement for bids for this unit								
	Date contract signed								
	Date Notice to Proceed issued								
1.	Was household income data verified?								
2.	Is information available which indicates that the eligibility criteria of the program guidelines have been met?								
3.	Was the work write-up and/or plans signed by the owner?								
4.	Were bids in line with the preliminary cost estimates and work write-up?								
5.	Was contracting done on a competitive basis?								
6.	Contractor: Date cleared:								
	Contractor: Date cleared:								
	Was the prime contractor(s) clear prior to contract execution?								
7.	Was D.S.S. contracted to verify that the contractor(s) is current in his child support payments, if applicable?								
8.	Was contractor's general liability and workman's compensation insurance verified?								

		Yes		Wo-
L	Does the contract include:			
	Title VI Clause		_	
	 E.O. 11246 Slandard Clause (above \$10K) or 3 paragraph E.O. Provisions (\$10K or less) 			
	 Notice of Requirement for Affirmative Action (above \$10,000) 		_	
	Standard E.O. 11246 Specifications (goals inserted - above \$10,000)			
	4 Section 109 Clause			
	Section 3 Clause			
	* Segregated Facilities Clause			
	Lead Base Paint Clause			
	Fire Administration Authorization Act of 1992			
	Access to Records/Maintenance of Records Charse		_	
	* Confict of Interest		_	
	Contractor/Subcontractor certification of EEO HUD 950.1 and 950.2 (above \$10,000)			
٥.	Was the homeowner required to temporarily relocate to another unit?			
	~ If Yes. * Was the unit inspected for Section 8 compliance?		_	
	Did this unit pass or fail Section 8 compliance?			
	• Was the homeowner notified of the pass/full status of this unit?			
	•		_	
	Were systematic site inspections made prior to making progress payments?			
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		_	
,	Was a final inspection made upon receipt of the final invoice from the contractor?			
_			_	
ł	Is there a dated notification "Walch Out for Lead-Based Paint Poisoning" form signed			
•	by the homeowner or tenant?			
	by the noncountry or manner:			
	Are homeowners being insured through the national food insurance program?			
-	rec someomica scang assect anough are assect account program:		_	
5	Was this home in a food zone?			
•	~ If Yes, did grantee followits adopted Floodplain Ordinance for construction?		-	
	" II 70, as games and as asspect thought the contains at contains and		-	
=	Did grantee address deficiencies identified in the application? (handicapped features, etc.)			
.	to grante accies decences is a me application: (nanocapped leades, etc.)			
,	Was the job completed in accordance with the contract and warranty?			
•-	Has the job completed in accordance with the command with many:		-	
	Was a "Notice of Acceptance of Work" issued?			
D .	was a wonce of Acceptance of Work Issued:		- —	
	Man a Walterfor of Dobaco of Line and antipubly recording recorded from the			
7.	Was a "Notification of Release of Lien" and applicable varianties received from the			
	contractor, all subcontractors and suppliers?			
	Man final surment made at the end of the marind fine period?			
	Was final payment made at the end of the required lien period?		-	
	Idlan a Ean God on the whole will all the whole affect aff			
1.	Was a lien filed on the rehab unit at the clerk of court's office as per our minimum five			
	year defened loan program policy?		-	
0	ments / Recommended Corrective Action:			
_				
	Housing Rehabilisation (Par	ŧ2)	Реде 2	of 2

	Clearance and Demolition				
				Nove	mber, '96
Grant	ee: Contract #:	FY:			
Revie	wed By: Date	e:			
1.	a) Does the grantee have an adopted code enforcement policy or condemnation policy?	<u>Yes</u>	<u>No</u>	<u>N/A</u>	
	→ If Yes, what code(s) is being used? (i.e., Section 8, Southern Building	Code, lo	cal code	e, etc.)	
	b) Are condemnation procedures for demolition purposes following t requirements set forth in the <u>LCDBG Handbook</u> ?	he			
	↓ If Yes, is the acquisition of property involved?				
	(If Yes, use the appropriate Acquisition Checklist(s))				
	→ If No, did the grantee execute a clearance/demolition				
	agreement or a similar document with the property owner prior to starting such activities?				
	→ If Yes, does the agreement comply with R.S. 33:4761 as				
	set forth in the <u>LCDBG Grantee Handbook</u> ? Comments:				
					_ _ _
2.	How many units were approved by the State for demolition?				
3.	Does demolition involve more than 8 housing units in one contract or under one roof? (check Davis-Bacon applicability) Comments:	8			_
4.	How many units will not be replaced of the total units to be demolish Comments:				<u> </u>
5.	Does the number of units scheduled for demolition correspond to the number approved for demolition?	e 			
	ଧ୍ୟf No, explain:				
Clear	ance/Demolition				Page 1

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6.	What criteria was used to determine the unit was suitable for demolition?	
	(The criteria can be in the form of photographs, a completed Section 8 checklist, a letter from the lost of health which condemns structures or from the chief elected official's office.)	oard
7.	How many units were inhabited just prior to demolition?	
-	How many of those were scheduled for replacement?	
	If they were inhabited and not scheduled for replacement, explain why:	
3.	What problems, if any, has the grantee faced with demolition?	
).	Do you feel the grantee needs assistance with demolition?	
	⊌If Yes, explain:	
١٥.	Are there clear lien certificates on the units that have been demolished?	

Clearance/Demolition of 2

Page 2

	RESIDENTIAL RELOCATION / D	ISPLACEMENT (p	art 1)				
						Nove	mber, '96
Gran	tee: Cont	ract #:		_ FY:			
Revi	ewed By: LGR:		Date:_				
	ew grantee's involvement in permanent relocation						
	orm Act activities. The checklist is for both relocation						
	nimum of five parcels must be reviewed if the total			is less t	han fifty	. For mo	re than
-	a total of 10% or a maximum of twenty must be re orm Act Relocation And Displacement	viewed for cor	mpliance.				
Ollin	offit Act Relocation And Displacement			Yes	<u>No</u>	N/A	
1.	Was or is permanent displacement anticipated as	a result of the	e LCDBG			<u></u>	
	Program?						
	Comments:						<u>—</u>
	If Yes, continue. If No, it is not necessary to com	nplete this che	cklist.				
2.	Total number of displacements subject to the Uni	form Act:					
	How many are 180 day owner occupied?						
	How many are 180 day renter occupied?						
	How many are 180 day business related?						
	How many are 180 day farm related?						
	Other (specify):						
	Comments:						
3.	Total number of displacements not be subject to	the Uniform A	ct:		_		
4.	Were the displacements carried out in accordance	e with the Act?	?				
	↳ If No, explain how these relocations do not conf	orm to the Act	t?				
5.	Were replacement units inspected for Section 8 c	•					_
6.	Were relocation/displacement payments made in Uniform Act requirements?	accordance w	vith				
Residence of 2	dential Relocation/Displacement (Part 1)						Page 1
	68 LCDRG Program Evaluation & Monite	oring Dlan					

LCDBG | Program Evaluation & Monitoring Plan

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	Comments:							
Com	Complete the "Residential Relocation/Displacement Checklist (part 2)" for Uniform Act activities.							
Non-Uniform Act Relocation And Displacement								
		<u>Yes</u>	<u>No</u>	<u>N/A</u>				
1.	Does the grantee have a locally adopted relocation policy covering							
	non-Uniform Act relocation procedures?							
	Comments:							
2.	Were non-Uniform Act displacements carried out in accordance with the							
	relocation policy?							
	Comments:							

Residential Relocation/Displacement (part 1)

Page 2 of 2

person?

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ri 3 4 7

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Page 2 of 4

10

6

		ı	~ Parcel A ~	*	~ Parcel B ~	el B ~
	~	Yes No	Comment	Yes	8	Comment
Ξ	11. Was a 90-day "Notice to Vacate" issued?			1		
12	 If a 90-day notice was issued, was it: issued after the Notice of Displacement? 	i	3	1	,	21
	 issued after referrals to replacement housing? 			1		2.4
	 received by the displaced person? 			I		
	 followed by a 30-day "Notice to Vacate?" 	1	190	1	J	T y S
5.	 Is there evidence of receipt of the 30-day "Notice to Vacate?" 	1		1		
4	Was the displaced person moved into an inspected housing unit?		1	1		
5.	 If the displaced person moved into a substandard unit, was required letter sent? 	Ī	34	1	3	f
16.	16. Is there evidence of receipt of that letter?			1		
17.	Was a claim for moving costs submitted?	I		1		75(6)
80	 18. If a moving costs claim was submitted, was the claim: completely documented? 	aim:		1	,	
	• verified?			1		
	• paid?			1		
19.	Was a claim for replacement housing assistance (homeowner, or down payment assistance or rental assistance) submitted?	1		1		

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		~ Parcel A ~	~ Farcel B ∼
		Yes No Comment	Yes No Comment
20	If a claim was submitted, was the claim:		
	 completely documented? 		
	• verified?		
	paid in a lump sum?		
21	 If any claims were not paid, is there documentation of the basis for denial? 		2. 21 2. 3.
22	22. Did grantee invoke "Last Resort Replacement Housing" provisions in this case?		
23	23. If "Last Resort" was invoked, note the form and amount of assistance provided:	d amount of assistance provided:	
24	24. Comments / Recommended Corrective Action:		t i

		ANTI-DISPLACEMENT (part 2	2)				
						November, '	96
Grant	ee:	Contract #:		_FY:		_	
Revie	wed By:	LGR:	Date:_		<u>—</u>		
				<u>Yes</u>	<u>No</u>	<u>N/A</u>	
Identi	fication of Occupants.						
	•	amilies, individuals and non-re	sidential persor	ıs.)			
1.	members, gross income,	ring all households by name, no rent, utility costs and apartmen occupying the property on the rantee?	nt size, and				
	↓ If Yes,						
	b) what is the nu	mber of households? mber of non-residential persoi	ns?				
2.	members, gross income, identifying other persons	ring all households by name, no rent, utility costs and apartmen who moved into the property ittal but before completion of	nt size, and after the				
	If Yes, what is the numb	er of households?					
	Comments:						
3.	Are there records identify rental status after comple	ring all of the occupants, and o	wnership or				
	→ If Yes, what is the numb	er of households?					
	Comments:						
4.	·	planation for the cause of the r ently relocated but was not disp	•				
	→ If Yes, what is the numb	er of households?					
	Comments:						
Antid	splacement (Part 2)				Page	1 of 3	

Records On Displacement.			
(Persons forced to move permanently are considered "displaced".)	<u>Yes</u>	<u>No</u>	<u>N/A</u>
5. If anyone was displaced as a result of this program, is there proper documentation of file?			
If Yes, review a random sample of case files with the following.			
Does the case file contain:			
copy of a timely general information notice?			
copy of a timely notice of eligibility for relocation assistance?			
a record of personal contacts & advisory services provided?			
revidence of referrals to comparable or suitable (affordable) replacement housing?			
copy of the 90-day advance notice of required date of move?			
ridentification of actual replacement property/rent/utility costs of dwelling and date of relocation?			
copy of replacement dwelling inspection report and date of inspection?			
revidence eligible tenant/owner received a Section 8 certificate			
or cash replacement housing assistance?			
rapproval form for, or evidence of payment of moving expenses?			
Have copies of the displacement been sent to the State? Comments:			
Records On Persons Not Displaced.			
Review a random sample of case files. 6. Does the case file contain the following:			
a time notice explaining persons would not be displaced, and information on after-rehabilitation rents?			
evidence the person was reimbursed for out-of-pocket expenses			
if temporary relocation or move within property was required? Comments:			
Monitoring Of Owner:			
7. Was the displacement made public in the newspaper prior to the recognition of the contract? Comments:			
Antidisplacement (Part 2)		Page 2	2 of 3

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Last Modified: 12/12/2019

Re	place	ement Units.	<u>Yes</u>	<u>No</u>	<u>N/A</u>
8.	a)	Was the total number of units to be rehabilitated reduced? (i.e., changing a four-plex into a duplex)			
		If Yes, explain:			=
	b) c)	Were the applicable steps followed for "one for one" replacement under Section 104D to accomplish the reduction? Was it made public in newspaper prior to recognition of contract?	· 		
		↳ If No, explain:			_
	d)	Does the grantee have the following:			
		ra description of the assisted activity?			
		a map with the location and number of dwelling units by size			
		(# of bedrooms) that will be demolished or converted to a use other than for low/mod income units as a result of the activity?			
		ra time schedule for the commencement and completion of the demolition or conversion?			
		a map with location & number of dwelling units by size			
		(# of bedrooms) that will be provided as replacement dwelling units?			
		ra source of funding and a time schedule for the provision of replacement dwelling units?			
		rthe basis for concluding that each rental replacement dwelling unit will remain a low/mod income unit for at least 10 years from the date of initial occupancy?			
		rinformation demonstrating that any proposed replacement of units with	1		
		smaller units (i.e., a two-bedroom unit with two one bedroom units) is consistent with the housing needs of low/mod income households in the jurisdiction?			
		اد If No, explain:			
Ар	peals	s/Complaints/Need For A Follow-Up:			
9.		Has there been appropriate responses to any appeals/complaints?			
10		Is additional technical assistance, monitoring, or training on tenant assistance requirements needed? Comments:			
An	tidisp	placement (Part 2)		Page 3	of 3

8: Program Evaluation and Monitoring Report Codes

- 1. CONTRACT NUMBER
- 2. SOURCE OF FINDING (1 Digit)
 - 0 = Ongoing Monitoring
 - 1 = On site
 - 2 = Complaints
 - 3 = HUD Oversight
 - 4 = Audit
 - 5 = Other
 - 6 = In-House
- 3. <u>SERIOUSNESS OF FINDING</u> (1 Digit)
 - 0 = Minor
 - 1 = Serious
 - 2 = Very Serious
- 4. PROGRAM AREA (2 Digits)
 - 01 = Financial Management
 - 02 = Environmental Review
 - 03 = Labor Standards
 - 04 = Civil Rights
 - 05 = Acquisition
 - 06 = Relocation
 - 07 = Housing Rehabilitation
 - 08 = Procurement
 - 09 = Program Performance-Administration

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- 10 = National Objectives
- 12 = Record Keeping
- 13 = Citizen Participation
- 14 = Other (including but not limited to: Anti-displacement, Clearance/Demolition, and Economic Development

9: Monitoring Letter

DATE

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 99999

RE: Monitoring Report

FY 20xx LCDBG Public Facilities Program

Contract Number 777777

Dear Mr. Smith:

On March 13, 20xx, a visit to the Village was conducted for the purpose of monitoring your FY 20xx Louisiana Community Development Block Grant (LCDBG) program. This office appreciates the courtesy and cooperation extended to the staff members during their visit.

A review was conducted in the following areas: Acquisition, Anti-displacement, Citizen Participation, Civil Rights, Environmental Review, Financial Management, Labor Standards, National Objectives, Procurement, Program Performance, and Record Keeping.

The monitoring review indicated that the Village has the continuing capacity to carry out the program activities in a timely manner. The Program has been implemented in accordance with the requirements and primary objectives of the Housing and Community Development Act and other applicable laws with the exceptions identified herein. Although other deficiencies may exist, they were not detected during the review.

FINDINGS OF DEFICIENCY

CITIZEN PARTICIPATION

The citizen participation files were reviewed for completeness and accuracy.

Finding Number 777777-1-1-131

The Village's Citizen Participation Plan was adopted on December 11, 20xx, which was after the first public hearing on September 30, 20xx. Page 12 of the FY 20x0/20x1 Application Package states, "The local Citizen Participation Plan must be made available to the public at the first public hearing."

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Honorable John Smith

Date

Page 2

<u>Corrective Action Required:</u> The Village must send us an explanation as to why the program requirements for the timely adoption of the Citizen Participation Plan and presentation at the public hearing were not followed and written assurance that required Citizen Participation procedures will be followed under the remainder of this program and under any future LCDBG programs.

Finding Number 777777-1-1-132

During our review we noted that the Village did not have a roster of attendance or minutes of the first public hearing. Task A-14 in the FY 20xx Grantee Handbook indicates that Citizen Participation is a major file category which should contain "...List of persons attending public hearings and minutes of the meetings...."

<u>Corrective Action Required:</u> The Village must provide us with an explanation as to why there was no roster of attendance and minutes of the first public hearing and written assurance that program requirements regarding Citizen Participation will be followed under the remainder of this program and under any future LCDBG programs.

PROCUREMENT

The Village's general files on procurement were reviewed in addition to the procurement procedures utilized in hiring consulting and engineering services.

Finding Number 777777-1-1-081

We received documentation which indicated that engineering costs were reviewed for reasonableness but such documentation was not signed until the day of our monitoring visit. The FY 20x0/20x1 Application Package, on page 31, states, "If qualification statements are requested, the cost and price detail form must be used when negotiations on the fees to be charged begin with the firm that was selected based on the evaluation of the selection criteria." Therefore, the cost and price detail form should have been completed prior to the execution of the contract with the engineering firm.

<u>Corrective Action Required:</u> The Village must provide us a written explanation of the reason(s) why documentation which indicated that engineering costs were reviewed for reasonableness was not prepared and signed at the appropriate time.

Honorable John Smith

Date

FINDINGS OF MERIT

ACQUISITION

The Town's files were reviewed to determine compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Acquisition of property was not necessary to carry out the street project according to a certification from the Village's Attorney, Surely Smart, Jr., dated June 10, 20xx.

ANTI-DISPLACEMENT

The Village's Anti-Displacement Plan, certification, and resolution were checked and found to be in accordance with program requirements. Additionally, no displacement occurred as a result of this project.

CIVIL RIGHTS

The review of this area encompassed recipient employment, Section 3 requirements, fair housing, equal opportunity and Section 504 requirements. The Village is in compliance in the areas of civil rights.

ENVIRONMENTAL REVIEW

No activities or project sites have changed from those cleared in the original Environmental Review Record; therefore, your Environmental Review Record remains relevant and complete.

FINANCIAL MANAGEMENT

A review of the financial management records of the FY 20x0 LCDBG Program was conducted to determine compliance with the standards for financial management systems. (24 CFR Part 85.20)

LABOR STANDARDS

A review was made of the bid documents, payroll sheets, employee interviews, the applicable federal wage decision and inspection reports for the water project. Based on our review of these records, the Village was found to be in compliance with federal labor standards requirements.

NATIONAL OBJECTIVES

Program benefit was reviewed by the staff of the Office of Community Development. Based on the local survey forms and/or census data and an inspection of the target area, seventy-five percent of the persons benefiting from the water project are of low and moderate income. Therefore, the Village was found to be in compliance with the national objective requirements of 24 CFR 570.483 (b).

Honorable John Smith

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Date

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PROGRAM PERFORMANCE

The Village's progress in completing the program activities in accordance with the Time Schedule submitted with your original application for funding under the LCDBG Program was reviewed. The Village's project has progressed in a timely manner. The water project will be completed prior to the contract termination date of August 24, 20XX.

RECORD KEEPING

The Village is maintaining the program records in accordance with the State's program requirements. When the staff requested specific information during the monitoring visit, the supporting documentation was easily retrievable.

Please submit the items required to address the findings of deficiency to us no later than April 30, 20XX. Also, please make a copy of this letter available to your auditor, who will determine which of the above noted deficiencies, if any, are material and should be included in any of the applicable financial reports. Your cooperation in this matter is appreciated. Should you have any questions, please call Fred Jones at (000) 000-0000.

Sincerely,

Traci M. Watts
Director, Louisiana Community
Development Block Grant Program

c: Ms. Debbie Howe, Grants ConsultantUptown & Associates, EngineerMr. John Doe, Office of Community Development

File: Public Facilities, FY 20xx, Monitoring

10: Corrective and Remedial Actions Policy

Louisiana Community Development Block Grant (LCDBG) Program

Corrective and Remedial Actions

aka Sanction Policy

Introduction

This policy describes the types of administrative actions that can be taken by the Office of Community Development in cases of improper or inadequate performance by recipients of LCDBG Program grants. In each instance, to the extent possible under the circumstances, the action taken will be intended, first, to prevent a continuation of the deficiency; second, to mitigate any adverse effects or consequences of the deficiency; and, third, to prevent a recurrence of the same or similar deficiencies.

Types of Deficiencies

A deficiency is an instance of non-performance of activities or non-compliance with requirements set forth in the contract between the State of Louisiana and the recipient of LCDBG funds. Examples of deficiencies include, but are not limited to, the following:

- 1. Failure to clear monitoring findings within 120 days of the issuance date by the Office of Community Development. An on-site monitoring visit (for the purpose of assuring the grant recipient's compliance with the federal and state requirements governing the LCDBG Program) may be conducted as a matter of routine monitoring or whenever problems come to the attention of the Office of Community Development. Following the monitoring visit, a letter is written to the grant recipient which identifies findings of deficiency as well as findings of merit, the corrective action required to clear findings of deficiency, and a target date for the accomplishment of the corrective actions. Upon receipt and review of the grant recipient's response, the Office of Community Development determines whether or not the response is sufficient to resolve the findings. If any monitoring findings are not properly resolved by the initial target date, the grant recipient is advised of such and is assigned a second target date for the clearance of those findings. All monitoring findings not resolved by the second target date remain open until resolved.
- 2. Failure to file reports as required or failure to file reports within established timeframes. Such reports include but are not limited to the Minority Business Report, financial reports, and closeout documents.
- 3. Failure to resolve an audit finding within 120 days of the issuance date by the Office of Community Development.
- 4. Incurring costs for ineligible activities in accordance with state and federal regulations.

5. Lack of continuing capacity to administer the LCDBG program.

6. Failure to execute approved activities in accordance with the program (time) schedule included

between the State and the grant recipient.

7. The implementation of a program change without prior written approval from the Office of Community

Development.

Notice of Deficiency

The first step in the corrective procedure is for the Office of Community Development to send a written Notice of Deficiency to the grant recipient. The notice will describe the deficiency specifically and objectively, describe actions the grant recipient must take in order to remedy the deficiency and a deadline for doing so, and describe the consequences for failure to remedy the deficiency (i.e.

administrative sanctions or legal action).

Sanctions

If the deficiency remains uncorrected, one or more sanctions will be imposed. The choice of the sanction(s) to be issued is governed by the objectives identified in the Introduction, the type of deficiency,

and the seriousness of the deficiency. Possible sanctions include but are not limited to:

1. Required administrative change: For example, if the consultant administering the program is doing a poor job but the grant recipient has the continuing capacity to administer the grant, the grant recipient

may be required to discharge the consultant and engage someone else to administer the program.

2. Suspension of grant payments.

3. Reduction of grant amount.

4. Termination of grant.

5. Reimbursement of costs disallowed by the Office of Community Development.

6. Disqualification from consideration for other LCDBG funds.. The criteria for disqualification shall be

consistent with, but not limited to, the State's threshold requirements for funding.

7. Legal action pursued by the State.

If the grant recipient does not address the cited problem after having been sanctioned, additional

sanctions may be imposed, or the matter may be referred for legal action.

Appeals

The grant recipient may appeal any imposed sanctions through the following process. The grant recipient must submit a written request for an appeal within ten working days after the written notice of sanction has been received. A written decision shall be rendered within ten working days of receipt of the request for appeal unless additional time is agreed to by the recipient.

Duration of Imposed Sanction

The Office of Community Development will maintain a sanction list of those sanctions which render the grant recipient ineligible for additional grant awards. The list will identify the grant recipient, a brief description as to why the sanction was imposed, and what steps must be taken to remove the sanction.

The sanction will remain in effect until the deficiency has been corrected or for no more than ten LCDBG program years with the following exception. Sanctions involving LCDBG funds which were expended for ineligible activities as identified in the federal regulations (24CFR 570.207) cannot be excused unless those funds have been repaid to the State or a satisfactory arrangement for the repayment of those funds have been made and payments are current. The grant recipient will be advised in writing when the sanction has been lifted.

Internal Procedures for Issuing/Clearing Sanctions

- 1. If a Local Government Representative (LGR) feels that he/she should issue a sanction, he/she should set up a meeting which includes his/her Program Manager, the Policy and Programs Coordinator, and the Community Development Director. The purpose of this meeting will be to determine if a sanction should be issued. If a determination is made to issue a sanction, the penalty/time frame attached to that sanction will also be determined. Every effort will be made to insure consistency among the sanctions imposed.
- 2. The LGR will advise the grant recipient in writing of the sanction. That letter will identify the deficiency which has resulted in the sanction, the steps that can be taken to correct the deficiency, the penalty which will be imposed, and any timeframe associated with the sanction. If the grant recipient will be prohibited from receiving LCDBG funds for a specified time period, the timeframe must be clearly and specifically identified. A copy of this letter will be given to the Director.
- 3. The Director will be responsible for maintaining the Sanction List which tracks those sanctions having an effect on a potential applicant's eligibility for future funding. The information contained in the letter issuing the sanction will be summarized on this list.
- 4. When the grant recipient corrects the deficiency or the timeframe associated with the sanction period ends, the LGR will advise the grant recipient of such in writing. A copy of that letter will be given to the Director who will remove the grant recipient from the Sanction List, if applicable.

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- 5. The permanent working files for the grant associated with the sanction must remain in the Office of Community Development as long as the sanction is in effect; these files cannot be archived until the sanction has been lifted.
- 6. The final determination of the issuance and clearance of each sanction rests with the Director of the Office of Community Development.

Original Effective Date: August 20, 1987

Revised Date: May 8, 2017

11: Request for Closeout Documents Letter

DATE

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 99999

RE: Request for Closeout Documents
FY 20xx LCDBG Public Facilities Program
Contract Number 777777

Dear Mayor Smith:

According to the Program records, eighty-six percent of the Village's FY 20xx Community Development Block Grant (LCDBG) funds have been requested. The Village should begin to undertake the procedures necessary to close out the Program. For a *conditional* closeout all program findings must have been cleared. *Final* closeout will be contingent on the receipt of financial reports or other acceptable documentation covering all LCDBG funds expended under the Program.

The closeout requirements as stated in Section E of the most recent Grantee Handbook are applicable for the closeout of all grants regardless of the funding year. The proper Program Completion Report forms for use in the preparation of closeout documents are available under the "Exhibits E" tab of the most recent Grantee Handbook, which is located on the Office of Community Development's website at http://www.doa.la.gov/pages/ocd/cdbg/lcdbg_grant_management.aspx. Two copies of the completed Program Completion Report must be submitted to this office.

Specific items which must be submitted as a part of the Program Completion Report include but are not limited to: (a) any change orders, including a final "reconciliation change order," that have not been previously submitted to the LCDBG staff engineer, (b) a copy of the recorded clear lien certificate(s) for any projects involving infrastructure improvements or housing improvements, (c), three copies of the Certificate of Completion, all of which must have original signatures and (d) a Final Wage Compliance Report if Davis-Bacon requirements were applicable to the project.

We look forward to a prompt closeout of your program. If you have any questions regarding closeout, please do not hesitate to contact Fred Jones at (225) 342-7412.

Sincerely,

Traci M. Watts Director, LCDBG Program

c: Ms. Debbie Howe, Administrative Consultant

Mr. Fred Jones, Local Government Representative

File: Public Facilities, FY 20xx, Closeout

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Last Modified: 12/12/2019

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12: Financial Report Reminder Letter

DATE

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 777777

RE: LCDBG Financial Report Requirements

FY 20xx Public Facilities Program—Contract Number 777777

Dear Mayor Smith:

The federal Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards requires a single audit to be conducted by local governments having \$750,000 or more in **total federal funds expended** in a fiscal year. The single audit must meet federal, State and Louisiana Community Development Block Grant (LCDBG) requirements. Federal funds expended that total less than \$750,000 in the fiscal year do not require the completion of a single audit.

If it is determined that a single audit is not required, State law and the LCDBG contract require the submittal of one of the following financial reports based on *revenues received from all sources* (federal, state and local) during a fiscal year: 1) certification and sworn financial statements if revenue received was \$75,000 or less; 2) an annual compilation if revenue received was between \$75,000 and \$199,999; 3) a reviewed financial statement accompanied by an attestation report if revenue received was \$200,000 or greater, but less than \$500,000; or, 4) an annual audit if revenue received was \$500,000 or more. All reports must be prepared in accordance with the Louisiana Governmental Audit Guide and submitted directly to the Office of Community Development via hard or electronic copy.

Financial reports/audits are due annually to this office within six months of the local government's fiscal year end date. Small Cities LCDBG funds must be reported under CFDA number 14.228. Please provide the auditor with a copy of this letter. If there are any questions concerning audit requirements, please call Rich Krimmel at (225) 342-7412.

Sincerely,

Traci M. Watts
Director, LCDBG Program

Ms. Debbie Howe, Grant Administrator
 Mr. Fred Jones, Local Government Representative
 Public Facilities, FY 20xx, Financial Management

13: Past Due Financial Report Letter

DATE

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 777777

RE: Request for Past-Due Financial Report FY 20xx Public Facilities Program

Contract Number 777777

Dear Mayor Smith:

According to our records, the Village should have had a financial report prepared for the fiscal year ending December 30, 20xx; therefore, the financial report should have been submitted to us no later than June 30, 20xx, which was six months after the fiscal year end date. To date we have not received that financial report.

If our records are correct, please forward us a hard or electronic copy of the financial report and any supplemental letters, management reports, et cetera, which accompanied the financial report. If our records are incorrect, please notify us in writing of the period that will be covered in your next audit so that we can document our files accordingly.

If you have any questions about this, please contact Fred Jones at (225) 342-7412.

Sincerely,

Traci M. Watts Director, LCDBG Program

c: Ms. Debbie Howe, Grant Administrator

> Mr. Fred Jones, Local Government Representative Public Facilities, FY 20xx, Financial Management

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14: Conditional Closeout Letter

DATE

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 999999

RE: Conditional Closeout

FY 20xx LCDBG Public Facilities Program

Contract Number 777777

Dear Mayor Smith:

The Office of Community Development has received the closeout documents submitted for the above referenced Louisiana Community Development Block Grant (LCDBG) Program. All of the documents required for a conditional closeout have been reviewed and accepted. All findings, if any, have been cleared. Therefore, a Certificate of Completion for contract number 777777 is enclosed.

The Program is closed out contingent upon approval by this office of an acceptable financial report(s) covering the unreported expenditures of \$492,300.25. Any questioned costs arising from the financial report(s) will have to be resolved. The Village will be responsible for disallowed costs, if any. Until the financial documentation is received and accepted, this office cannot issue a final closeout on this program.

Please note that all records and correspondence relating to the Program must be retained until the State issues authorization for them to be discarded. If you have any questions, please call Fred Jones at (225) 342-7412.

Sincerely,

Traci M. Watts
Director, LCDBG Program

Enclosure

c with enc: Ms. Debbie Howe, Administrative Consultant

Ms. Pat Robertson, Office of Finance and Support Services Ms. Donna Lynn, Office of Community Development Mr. Fred Jones, Local Government Representative

File: Public Facilities, FY 20xx, Closeout

15: Final Closeout without Conditional Closeout LetterDATE

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 999999

RE: Final Closeout

FY 20xx LCDBG-Public Facilities Program

Contract Number 777777

Dear Mayor Smith:

The Office of Community Development has received and reviewed the closeout documents submitted for the FY 20xx LCDBG Public Facilities Program and has found them acceptable. All findings, if any, relative to this program have been cleared. Also, all LCDBG funds received have been included in an acceptable financial report(s). Therefore, a Certificate of Completion for contract number 777777 is enclosed.

The Office of Community Development is officially closing out this LCDBG Program.

Please note that all records and correspondence relating to the FY 20xx LCDBG Public Facilities Program must be retained until the State issues authorization for them to be discarded.

Sincerely,

Traci M. Watts
Director, LCDBG Program

Enclosure

c: Ms. Debbie Howe

Ms. Pat Anderson, Office of Finance and Support Services

Ms. Donna Lynn, Office of Community Development

Mr. Fred Jones, Local Government Representative

File: Public Facilities, FY 20xx, Closeout

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16: Final Closeout after Conditional Closeout Letter

Honorable John Smith Mayor, Village of Someplace Post Office Box 123456 Someplace, Louisiana 999999

RE: Final Closeout

FY 20xx LCDBG Public Facilities Program Contract Number 777777

Dear Mayor Smith:

On February 31, 20x2, a letter and Certificate of Completion were sent to you conditionally closing out the FY 20xx Louisiana Community Development Block Grant (LCDBG) Program. In that letter it was stated that a final closeout would be issued upon our receipt and approval of an acceptable financial report covering the unaudited expenditures of \$123,123. This office has since received a financial report(s) covering all unaudited expenditures. All funds received and expended under this LCDBG Program have now been audited.

The Office of Community Development is officially closing out this LCDBG Program.

Please note that all records and correspondence relating to the FY 20xx LCDBG Program must be retained until the State issues authorization for them to be discarded.

Sincerely,

Traci M. Watts
Director, LCDBG Program

c: Ms. Debbie Howe, Administrative Consultant

Ms. Pat Anderson, Office of Finance and Support Services

Ms. Donna Lynn, Office of Community Development

Mr. Fred Jones, Local Government Representative

File: Public Facilities, FY 20xx, Closeout